

Chapter 1:

DRAFT

Wilderness Management Plan

WILDERNESS MANAGEMENT GOALS AND OBJECTIVES

Description and Significance

Public Law 92-536 (the Act of October 23, 1972) established Cumberland Island National Seashore (CUIS) in the State of Georgia. The park is located in southeast Georgia near the Florida State line (see Map 1, Location Map). The park consists of approximately 40,000 acres and represents one of the finest examples of barrier islands along the Atlantic Coast.

Public Law 97-250 (the Act of September 8, 1982) established the Cumberland Island Wilderness, designating as wilderness and therefore, components of the National Wilderness Preservation System certain lands in the Cumberland Island National Seashore, Georgia which comprise about 8,840 acres of the island. "Certain other lands in the Seashore, which comprise about 11,718 acres and are designated on the Cumberland Island Wilderness map as 'Potential Wilderness,' are, effective upon publication in the *Federal Register* of a notice by the Secretary of the Interior that all uses thereon prohibited by the Wilderness Act have ceased, designated wilderness."

Lands and waters under full Federal ownership and management and without non-conforming uses are regarded as designated wilderness. Those lands, classified as potential wilderness, include private property, State-owned intertidal areas, and areas at the north end of the island in Federal ownership that are subject to retained rights. In all, Congress approved 20,558 acres on Cumberland Island for inclusion within the National Wilderness Preservation System. The 20,558 acres represent approximately 56% of the land and marsh within the seashore's boundaries. The wilderness area (see Map 2, Land Ownership and Wilderness Designation and Map 2a, Park Map) includes most of the island north of Stafford Plantation with the exception of the uplands on Little Cumberland Island and adjacent tidal marshes. Potential wilderness acreage will, within a determinable time, qualify and become wilderness once the non-conforming conditions or uses are terminated or the State chooses to transfer ownership to the Federal Government.

Both CUIS's enabling and wilderness legislation defined the purposes of the park: 1) to provide for public outdoor recreation and enjoyment; 2) to preserve related, scientific, scenic, and historical values while preserving the island's primitive character; and 3) subject to valid existing rights, to administer the wilderness area in accordance with the applicable provisions of the Wilderness Act.

CUIS is nationally significant for a number of reasons. It is one of the largest undeveloped barrier islands in the world and possesses a broad diversity of biological communities. CUIS provides habitat for three endangered species and the opportunity to enjoy a wilderness experience within 300 miles of several metropolitan areas including Atlanta, Orlando, and Jacksonville. The UNESCO Bureau of the International Coordinating Council for Man and the Biosphere designated CUIS as part of the Carolina-South Atlantic Biosphere Reserve-Sea Island Unit in 1986.

Map 1: LOCATION MAP



Map 2: LAND OWNERSHIP

Map 2a: PARK MAP



For more than 4,000 years, a variety of human visitors and residents have interacted with and relied upon the natural resources of Cumberland Island. The island and its inhabitants have played important roles in numerous significant periods of American history. The first Indian occupation dates back to before 3000 BC, with early ceramic cultures appearing around 2000 BC. Cultural affiliations shifted over time, but at the time of first contact with Europeans the Timucuan Indians occupied Cumberland Island. Later, a tribe named the Guale by the Spanish used Cumberland Island seasonally, harvesting fish and shellfish. Numerous shell middens and other archeological sites remain on Cumberland as a reminder of the long occupation by native people. Soon after the European discovery of the New World, the Sea Islands of North America's southeast coast were drawn into the larger Atlantic trading economy. In the sixteenth century, the natural abundance of Cumberland and other coastal islands attracted European galleons, which stopped long enough to load game birds, pelts, and naval stores. The sailors on these ships were drawn from various European and African trading areas, and these visits witnessed some of the first encounters among Africans, Europeans, and North American Indians.

The southeastern coast of North America, lying between Spanish Florida and the British settlements in Virginia, was contested ground from the early seventeenth to the late eighteenth century. Around 1600, Spanish priests and soldiers established a string of missions and related forts on the Georgia sea islands, including the missions of San Pedro de Mocama and San Pedro y San Pablo de Porturibo on Cumberland Island. During King George's War in the 1740s, General James Oglethorpe, founder of the Georgia colony, fortified Cumberland Island against the Spanish with Fort St. Andrew and Fort Prince William.

CUIS also possesses outstanding extant cultural resources that encompass four National Register Districts. These include shell middens from Indian occupation, 18th Century Fort St. Andrew, resources associated with nationally significant Revolutionary War figures, chimneys of slave cabins from the Plantation Era, resources from the "Gilded Age," and an early 20th Century African-American settlement.

Cumberland Island Wilderness contains a vast range of biological diversity. Threatened and endangered sea turtles nest along the beaches during the late spring and throughout the summer. The endangered wood stork and State-listed least tern nest during the late spring and early summer. The wilderness includes biologically unique aquatic systems such as Lake Whitney and the Sweetwater Lake Complex, located in the northern and central portions of the island near the coastal dunes. These aquatic ecosystems illustrate pond succession, a mesic bottom hardwood forest, and a large stand of old-forest growth swamp tupelo. The Sweetwater Lake Complex offers extensive breeding habitat for amphibians, shorebirds, and alligators. It also contains spectacular floral displays and the only known island colony of shoestring fern. An island slough complex at Lake Retta, located east of the Hickory Hill campsite and just north of the Willow Pond Trail, provides habitat for large numbers of herons, ibis, egrets, wood storks, ducks, and alligators. Exceptionally large loblolly pine, red bay, red maple, sweet bay, and other species populate a large mature forest. The wilderness also attracts large numbers of migrating birds. The State of Georgia

owns and co-manages the marshes west of Cumberland Island. The primary vegetation is salt marsh cord grass (Spartina alterniflora).

Island upland vegetation is mixed oak/hardwood forest that includes oak/palmetto and pine/oak scrub forest. Examples of primary natural communities are pond sloughs, dune-shrub thickets, and grass forb areas that provide nesting sites for gull-billed terns, least terns, and loggerhead sea turtles.

Visitors to the wilderness come to marvel at the area's vast range of natural and cultural resources. For years hikers have been traversing the wilderness, staying at the three official wilderness campgrounds. They walk the trails, stroll along a long stretch of undeveloped beach, and tolerate the many natural challenges of camping on a barrier island. Until recently, access for wilderness visitors has been limited to hikers. Within the last several years, kayakers have found the Cumberland Island Wilderness a desirable destination.

Wilderness Management

Purpose and Need for the Plan

NPS policy states that “each park containing wilderness will develop and maintain a wilderness management plan to guide the preservation, management, and use of that wilderness.” The purpose of the CUIS Wilderness Management Plan (WMP) is to serve as: 1) a document which allows the public to participate in the establishment of the wilderness management policies; 2) a means to establish the park’s wilderness vision and identify needed management actions to meet wilderness objectives; and 3) a working guide for NPS staff responsible for the long-term and day-to-day management of the wilderness resources.

Wilderness management Cumberland Island is complicated by the existence of individuals holding retained rights for activities not normally associated with wilderness. An important goal of the WMP will be to clarify the parameters of the individual retained rights and ensure that these rights are honored, in keeping with the park’s responsibilities for preserving the wilderness resource and values.

Vision for the Cumberland Island Wilderness

The 1964 Wilderness Act provides a clear definition of wilderness:

“A wilderness, in contrast with those areas where man and his own works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain. An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value.”

Cumberland Island Wilderness exhibits many of the attributes described in the Wilderness Act. It provides opportunities for solitude, risk, and challenge. Its beaches, marine forest, diversity of flora and fauna, and cultural resources are among the finest and most pristine on the barrier islands of this Nation. One may wander for days and encounter only island wildlife. On the other hand, the Cumberland Island Wilderness is a resource in transition. As a result of Congress’ acknowledgement of the legal rights of retained rights holders and landowners, the imprints of man’s work are noticeable. The Main Road carries vehicles from north to south; several east-west roads accommodate

vehicles between the Main Road and the beach; and vehicles may be found travelling up and down the beach. Several residences dot the wilderness.

When Congress established the Cumberland Island Wilderness, they were fully aware of its special qualities and the noticeable imprints of man. Congress charged, "[s]ubject to valid existing rights, the wilderness area shall be administered by the Secretary of the Interior in accordance with the applicable provisions of the Wilderness Act...." Adding to the complexity of the situation is the fact that the retained rights are all unique. In the legislative history of the Cumberland Island Wilderness, Congress acknowledged that it was handing the National Park Service (NPS) a complicated management problem. When it directed the NPS to "restore" the designated area to wilderness, Congress realized that it would take a long time and the interim would be a period of transition. For example, Congress recognized that in the interim, the NPS could use roads for emergency, law enforcement, and administrative purposes. Congress considered the vehicular access by private residents and the NPS as special and limited, to be phased out as soon as possible considering the special circumstances.

Accordingly, the WMP charts a long-term strategy to manage, restore, and preserve the wilderness while honoring the retained rights of residents and the rights of landowners. Based on the minimum requirement determination concept, the NPS will implement actions to comply with the letter and spirit of the Wilderness Act. Specific directions for managing natural and cultural resources are found in the Resource Management Plan (RMP).

Following the direction of Congress, the NPS requests all rights holders and landowners to exercise their rights in the wilderness with special care and to acknowledge that the Cumberland Island Wilderness is a resource managed and protected for the American public. The NPS will ensure that its visitors understand and appreciate wilderness resources and values. More so than any other public lands, wilderness is to be left in a manner in which it is found or natural processes are to be restored where they have been disrupted. The NPS responsibility is to manage that public land so that wilderness values and characteristics are preserved. The NPS in this WMP will develop strategies to make the transition to wilderness management as defined by the Wilderness Act for the 20,558 acres of designated wilderness and potential wilderness.

Goal of the Wilderness Management Plan

As stated in the Plan Introduction, the NPS established mission goals for CUIS. These goals have been used to prepare the WMP. Under the overall long-term goal of "Preserve Park Resources," CUIS will strive to achieve the following goal for wilderness: "All of the designated wilderness and potential wilderness on the island is managed as closely to the criteria of the Wilderness Act as possible, taking into account the retained rights and the roads, residences, and utilities thereof."

Public Law 97-250 provides further guidance: "Subject to valid existing rights, the wilderness areas shall be administered by the Secretary of the Interior in accordance with

the applicable provisions of the Wilderness act governing areas designated by that Act as wilderness areas....”

The park’s wilderness management will be crafted to ensure that the park’s wilderness resources and character are valued, enjoyed, protected, preserved, and restored for the benefit of this and proceeding generations. To accomplish the goal of wilderness management, the NPS has established the following objectives based on laws, policies and guidelines, the NPS Organic Act, Wilderness Act, CUIS’s enabling legislation, CUIS’s wilderness legislation, and NPS policies and guidelines.

Objectives of Wilderness Management

1. Protect natural resources and the integrity of the wilderness character for present and future generations.
2. Preserve cultural resources and foster for future generations their appreciation through appropriate research, treatment, protection, and education.
3. Provide for the public’s maximum freedom of use and enjoyment of the wilderness in a manner that will not sacrifice the quality of the wilderness’ natural and cultural resources.
4. Provide for public understanding and support of wilderness values.
5. Conduct wilderness management in such a manner as to ensure the preservation of the wilderness character through the use of the minimum requirement protocols and management techniques necessary to meet wilderness management goals.
6. Communicate the values of the Cumberland Island Wilderness and provide instruction in wilderness ethics, use, and management skills so that the public, island residents, and park staff have the knowledge and incentive to preserve those values.
7. Coordinate wilderness management activities with the cooperation and collaboration of affected agencies, organizations, and interest groups.
8. Clearly identify the rights of retained rights holders and provide for the consistent management and administration of these established rights.
9. Allow for the exercise of established rights in keeping with established laws and policies to guide the protection and preservation of cultural and natural resources
10. Serve as a long-term guide for field and management staff in application of wilderness management techniques and integration of wilderness management objectives in all park management documents and programs.

11. Establish clearly the park organizational and individual responsibilities for the administration and preservation of the wilderness resource.
12. Provide a range of opportunities for the use of the wilderness by the public while protecting the wilderness resource.
13. Apply policies consistently, thereby enhancing wilderness users' experiences and ensuring compliance with wilderness regulations.
14. Develop and implement a public information and education program to promote wilderness ethics and reduce behaviors that are harmful to natural and cultural resources and wilderness experience.
15. Establish a documented process to determine the minimum requirement for all activities affecting wilderness.
16. Base management decisions on sound scientific research. Incorporate data and information, as necessary, into a dynamic management program.
17. Provide and protect for present and future visitors the special qualities offered in wilderness.

Legislation and Pre-Existing Conditions

Legislative History and Constraints

CUIS Enabling Legislation

Public Law 92-536 (the Act of October 23, 1972) established the CUIS in the State of Georgia for the purposes of providing for public outdoor recreation use and enjoyment of significant shoreline lands and waters and to preserve related scenic, scientific, and historical values. The law stipulates that, except for property the Secretary of the Interior deems necessary for visitor facilities or administration of CUIS, “any owner or owners of improved property on the date of its acquisition by the Secretary may, as a condition of such acquisition, retain for themselves and their successors or assigns a right to use and occupancy of the property for noncommercial residential purposes, for 25 years, or ... for a term ending at the death of the owner or... spouse, whichever is later.” Lands acquired by the Secretary from the National Park Foundation are also subject to the written terms and conditions contained in those transactions, entered into by the National Park Foundation prior to July 1, 1973.

Public Law 92-536 further directs the Secretary to permit hunting, fishing, and trapping within the boundaries of CUIS in accordance with the appropriate laws of the State of Georgia. Accordingly, the Secretary may designate zones and establish periods when hunting, fishing, or trapping may be permitted for reasons of public safety, administration, fish and wildlife management, or public use and enjoyment.

The law directs the Secretary to preserve the island in its primitive state except for certain portions of the seashore deemed adaptable for recreational uses, particularly swimming, boating, fishing, hiking, horseback riding, and similar recreational activities. The Secretary is not to develop a plan or project for the convenience of visitors that would conflict with the preservation of the special flora and fauna or the physiographic conditions prevailing. The law also directs the Secretary to provide recommendations as to the suitability of any area of CUIS to be preserved as wilderness.

Public Law 92-536 also recognizes the authority of the Secretary of the Army (U.S. Army Corps of Engineers) to undertake or contribute to water resource developments, including shore erosion control, beach protection, and navigation improvements on land and or waters within the national seashore. The actions are to be exercised in accordance with mutually acceptable plans to the Secretary of the Army and the Secretary of the Interior.

Wilderness Legislation

Public Law 97-250 (the Act of September 8, 1982) established the Cumberland Island Wilderness. The law designated 8,840 acres as wilderness and 11,718 acres as potential wilderness. When all uses prohibited by the Wilderness Act on the 11,718 acres of

potential wilderness have ceased, the Secretary may designate those lands as wilderness. “Subject to valid existing rights, the wilderness areas shall be administered by the Secretary of the Interior in accordance with the applicable provisions of the Wilderness Act governing areas designated by that Act as wilderness areas...”

Congressional Committee Reports Accompanying Public Law 97-250

The legislative history accompanying Public Law 97-250 reflects some differences between the House of Representatives and the Senate. (Neither the House Committee nor the Senate Committee reports have the standing of law, and they may not be interpreted as such. The NPS will abide by the language of the Wilderness Act and the laws that established the national seashore and its wilderness; however, the committee reports help shed light on the framing of those laws.) The House Committee supports the compatibility and reinforcement wilderness designation provides in assuring that the dynamic natural forces on the wilderness-designated portions of the seashore will continue basically unfettered by human activities. The House Committee acknowledged the complexities inherent in the Cumberland Island Wilderness by recognizing: (1) the implications of retained rights (including vehicle use) granted to former landowners; (2) the need to restore, maintain, and provide public access to Plum Orchard; (3) geologically unstable intertidal zones proposed as potential wilderness addition; and (4) the existing non-wilderness uses of the intertidal areas and related channels. The Committee desired that all retained rights and the management activities of the NPS be exercised in a manner as compatible as possible with the wilderness and potential wilderness designation. The Committee also directed the NPS to manage the potential wilderness as wilderness to the extent legally possible.

The House Committee also recognized that the NPS may use access ways (primitive roads) for *emergency* purposes. The Committee emphasized that Public Law 97-250 shall affect neither retained right agreements previously negotiated by the Federal Government nor the renewal of special use permits in accordance with the established practices of the NPS.

The House Committee acknowledged the need for access to Plum Orchard for public visitation and NPS restoration, rehabilitation, and maintenance. The Committee urged the NPS to make every effort to use boat transportation for its preservation tasks. “In the interests of minimizing unnecessary intrusion on wilderness values,” the Committee urged the NPS “to make every effort to provide access to Plum Orchard for all purposes by water, and to complete all major restoration and rehabilitation activities at the earliest possible date.” The Committee acknowledged that the NPS could assess the cost of boat access in order to determine whether or not this use might be prohibitive or unfeasible for historic interpretation purposes related to combined tours of Dungeness and Plum Orchard. It also noted that it did not intend that any motorized vehicle use of Grand Avenue (the Main Road) should become a traditional or established use, and all such use shall be discontinued no later than the expiration of the last private, retained right to use any segment of the road. Existing utility lines may continue to be maintained by the

minimum necessary tools so long as the retained rights that require their existence remain.

Intertidal lands (those lands between mean high and mean low tides) within the boundary of CUIS located north of the Greyfield Inn on the western side and north of Stafford Beach on the eastern side are designated as potential wilderness. These intertidal areas are unstable and subject to changes due to tides and storms. The State of Georgia also claims ownership of the beach lying on the eastern side of the island.

Mr. Young (*Congressional Record* of December 15, 1981) on the floor of the House of Representatives stated that the “National Park Service is expected to set an example by conducting all of its activities within the wilderness and potential wilderness areas in a manner as compatible to wilderness as soon as possible.”

The Senate Report (No. 97-531) presents a different view than the House Report regarding access to Plum Orchard. The Senate Committee recognized the need for public visitation to Plum Orchard and NPS restoration, rehabilitation, and maintenance activities. The Senate Committee noted that the NPS may provide access via the potential wilderness segment of the Main Road; however, like the House Committee, it did not intend this use to become traditional or established.

The Senate Report also differs from the House in its direction regarding the use of existing roads. Like the House the Senate directed the NPS to use existing roads for emergency purposes; however, the Senate extended NPS responsibilities on existing roads to essential law enforcement and administrative purposes as long as retained rights remained.

Mr. McClure, Chairman of the Senate Committee on Energy and Natural Resources, noted that the majority of seashore lands be retained in and restored, as closely as possible, to their natural state. The committee supported the notion that wilderness designation assures that the dynamic natural forces at play on the seashore will continue unfettered by human activities. The committee further desired that all legally retained private rights as well as activities of the NPS be exercised in a manner as compatible as possible with the wilderness and potential wilderness designation.

The Senate Committee directed that existing utility lines may continue to be maintained, by the minimum practical tools, so long as the retained rights that require their existence remain. The committee intended that the NPS be responsible for determining what constitutes the minimum practical tool each time a maintenance activity is proposed.

Senator Sam Nunn (a co-sponsor of the Senate version of the bill) addressed the formidable task of managing the wilderness in his remarks in the *Congressional Record* of August 19, 1982. The Senator acknowledged that the existence within the wilderness of privately-owned estates and retained rights to vehicular access along primitive island roads presented a management challenge. The Senator stated that the NPS may use existing access ways for emergency purposes, for essential law enforcement and for

meeting minimum requirements for wilderness administration until these retained rights expire or are terminated. The Senator stressed that the ultimate goal of the wilderness plan for Cumberland Island is to phase out nonconforming-to-wilderness activities and uses as soon as practicable. He also stated that both private and NPS vehicular use is to be considered **special and limited** rather than traditional or established as defined in the Wilderness Act. The Senate Committee shared these concerns.

The Wilderness Act

Public Law 88-577, the Wilderness Act of 1964, established the National Wilderness Preservation System and provided for the study of Federal lands in the National Forests, National Wildlife Refuges, and the National Park System for potential inclusion in the System. Only Congress may designate an area as wilderness. The Secretary will administer wilderness areas for the use and enjoyment of the American people in such manner as will leave these **unimpaired** for future use and enjoyment as wilderness, including outstanding opportunities for solitude or a primitive and unconfined type of recreation. The preservation of the wilderness character and values is a major administrative responsibility of the NPS, and activities to achieve other legal purposes of areas designated as wilderness must be administered so as to preserve the wilderness character.

Camden County Court Judgment and Supplemental Decree

A Camden County, Georgia Superior Court Judgment and Supplemental Decree of July 6, 1964, and Supplemental Decree of June 1, 1965, determined rights of ingress, egress, and use of the main dock at Dungeness, a Service Area surrounding the main dock, and the Main Road. The court defined the Main Road as “extending the length of Cumberland Island Property from the northernmost point in Tract 5N to the southernmost point on the southern boundary on Tract 4S.” The Court described the easement for the Main Road at a width of 21 feet. The Court declared an easement of ingress, egress, and use of the Main Road to a number of parties (see Appendix F).

(The Road System section of the WMP lists the roads to which specific retained rights pertain. The Retained Rights section below lists the rights holders and private landowners who have the right to use certain roads on the island.)

The significance of these decrees to Cumberland Island Wilderness management is that the referred rights are contained within the retained rights of reserved estates and private property owners.

State and Federal Jurisdiction

Section 7 of Public Law 92-536 ensures that the Act that established CUIS does not “...deprive the State of Georgia or its political subdivisions of its civil and criminal jurisdiction over persons found, acts performed, and offenses committed, within the

boundaries of the seashore, or of its right to tax persons, corporations, franchises, or other non-federal property on land included therein.” In 1986 the State of Georgia ceded concurrent jurisdiction to the NPS. This action allowed the NPS to enforce State law within the boundaries of CUIS and continued to allow the State of Georgia to enforce State law within the park boundaries.

Retained Rights Affecting Wilderness

Section 4(a) of the Act establishing CUIS (Public Law 92-536) stipulated that, “any owner or owners of improved property on the date of its acquisition by the Secretary may, as a condition of such acquisition, retain for themselves and their successors or assigns a right of use and occupancy of the property for noncommercial residential purposes, for twenty-five years, or, in lieu thereof, for a term ending at the death of the owner or his spouse, whichever is later. The Act further states that the Secretary will acquire the lands subject to the **written terms and conditions** contained in the transactions with the National Park Foundation.

Section 2 (c) of the Act establishing the Cumberland Island Wilderness (Public Law 97-250) declared that:

“[s]ubject to valid existing rights, the wilderness area shall be administered by the Secretary of the Interior in accordance with the applicable provisions of the Wilderness Act, governing areas designated by that Act as wilderness areas, except that any reference in such provisions to the effective date of the wilderness act shall be deemed to be a reference to the effective date of this Act....”

The NPS and the National Park Foundation negotiated 21 retained rights agreements. The rights cover a wide variety of topics and subjects and are not universally shared by all of the retained rights holders. Some of the rights have a more direct effect on the wilderness than do others. For instance, under the Wilderness Act mechanical vehicles are prohibited within the wilderness; however, vehicular traffic occurs in the Cumberland Island Wilderness because the Wilderness Act also recognizes retained rights.

Because retained rights exist on Federal property, the retained rights holder and the NPS have the responsibility to ensure that activities on the property do not create an adverse impact on cultural and natural resources. Section 106 of the National Historic Preservation Act, as amended, the National Environmental Policy Act, the Clean Water Act, and other Federal environmental laws and regulations also govern activities on Federal property. As described in the RMP, CUIS has established a process with retained rights holders to evaluate activities (such as ground disturbance or modifications to objects or structures listed on the National Register of Historic Places) on these Federal properties.

The NPS recognizes that disagreements have arisen between it and retained rights holders on a number of issues pertaining to the exercise of rights in accordance with the various

laws governing the management of CUIS and the reserved rights agreements. The WMP will strive to deal with potential conflicts in an objective and constructive manner.

Appendix G contains a list of reserved rights delineated in the deeds and agreements that provide the contractual basis for the use of the Cumberland Island reserved estates. The list may be used to identify the general provisions applicable to a particular reserved estate. The NPS has carefully examined each reserved estate document to determine what retained rights may be exercised. The NPS will review the retained rights document with each retained right holder so that each party clearly understands its responsibilities. The NPS will refer to the specific deed and agreement governing the reserved estate for a comprehensive analysis of the actual provisions and objectively and constructively notify retained right holders who have superceded their rights. As authorized by Public Law 92-536 and Public Law 97-250, the NPS expects reserved estate holders to exercise only those rights identified in the individual reserved rights agreement and the Camden County Court Judgment and Supplemental Decree. In turn, the NPS will respect the rights granted within the documents.

Assignment of Rights

The retained rights agreements generally include a provision allowing the assignment of rights to others. Black's Law dictionary defines assignment as "the transfer by a party to another party all of its rights to some kind of property." Georgia case law makes clear that to assign a right, that right must be completely and unconditionally transferred to another party.

In the case of Cumberland Island, because the rights claimed to be assigned are interests in real property, the assignment must be in writing to be effective (Statute of Frauds). It should be noted that retained rights agreements stipulate that retained right holders "are required to give written notice to the NPS before rights are assigned."

Thus, if a right is assigned, the assignee is no longer in possession of it and therefore cannot benefit from it. In order to claim a real property right (an interest related to the land) by way of assignment, the transfer must be evidenced in writing. Therefore, retained rights holders may not share rights by claiming mutual assignment.

Island Residents' Utilities

Senate Report 97-538 stated that existing utility lines may continue to be maintained by the minimum practical tools so long as the retained rights that require their existence remain. (Utility lines are found inside and outside the wilderness within CUIS.) The Senate Committee directed the NPS to determine what constitutes the minimum practical tool(s) each time a maintenance activity is proposed. Such tool(s) may include motorized vehicles and mechanical equipment if the NPS determines that the use of such tool(s) is essential to repair and maintain the existing utility lines.

Since the establishment of the wilderness in 1982 and the guidance provided by Congress for its management, new technologies have emerged for the delivery of utilities. Requests

for upgrading telephones now consider cellular service involving telecommunications towers. The NPS's decision to permit these structures will be based on procedures issued by the Federal Communications Commission and subsequent NPS policies. (See the Other Administrative Facilities section.)

NPS policy (NPS-53) requires that a utility company have a right-of-way permit to operate within the boundaries of a park, and within a wilderness utility lines must be buried (NPS-45). Furthermore, additional utilities may not be piggybacked onto an existing utility.

Some residents have retained rights to "future" utilities. These rights may affect current phone system proposals for the island. If the phone company engineers a system only requiring installation of antennas at residences, any right holder would be allowed access to the new phone system. If the new phone system requires the installation of buried lines, only those rights holders with a specific right to utilities may receive the service. The park will work with the utility companies to ensure that the activities have little or no effect on the island's resources.

Rights To Use Roads

Because the right to operate vehicles in the wilderness has the most visibility, the plan lists below the rights holders and private landowners who have the right to use certain roads on the island. The 1964 and 1965 Camden County Court Judgment and Supplemental Decree ensured the right to operate a vehicle on the Main Road to a number of parties. Both current landowners (those who own land in fee simple) and retained rights holders are subject to the findings of the Camden County Court. The following list reflects the judgment and decree and the retained rights documents:

Right to use Main Road:

Thomas Johnston (spouse and issue, i.e. children)
Margaret Richards (spouse and issue, i.e. children)
Nancy Butler (spouse and issue)
Marius Johnston
M.J. Wright (expires 40 years from date of sale)
Coleman Johnston (expires 36 years from date of sale)
O.H. Olsen (life estate)
Grover Henderson (life estate)
Goodsell, Cumberland Island Holding Company
Thornton Morris (spouse and issue)
Perkins Family (William B. Perkins, Coleman C. Perkins, Frederick C. Perkins, Elizabeth B. Perkins, Margaret C. Perkins, Catherine Mc. C. Perkins plus spouse and issue)
Mary Bullard (children)
High Point, Inc. (29 stockholders)
Greyfield, Ltd.
Lucy C.J. Graves (expires 40 years from date of sale)

Cumberland Island Properties (life estate--Henry Carter Carnegie/James Henry Bratton, Jr. plus spouse and then living children)
Margaret C.R. Sprague (life estate for Margaret, spouse, and last surviving child)
Lucy Foster (life estate for Lucy Foster, Franklin R. Foster, Franklin Whittingham Foster, Lucy Carnegie Sprague Foster)
Carol Ruckdeschel/Earl R. Ruckdeschel/ Anne R. Ruckdeschel (life estate)
Coleman Johnston (and wife)
Private landowners

Right to use South Cut Road:

Mary Bullard (children)
Goodsell, Cumberland Island Holding Company

Right to use Duck House Road:

Mary Bullard (children)
Goodsell, Cumberland Island Holding Company
Margaret Richards (spouse and issue, i.e. children)
Nancy Butler (spouse and issue, i.e. children)

Right to use High Point Road:

Mary Bullard (children)
Goodsell, Cumberland Island Holding Company
O.H. Olsen (life estate)
Grover Henderson (life estate)

Right to use Table Point Road:

Mary Bullard (children)
Goodsell, Cumberland Island Holding Company
Coleman Johnston (and wife)

Right to use Long Point Road:

Mary Bullard (children)
Goodsell, Cumberland Island Holding Company

Right to use Candler Beach Road:

Mary Bullard (children)
Goodsell, Cumberland Island Holding Company

Right to use Whitney Road:

Mary Bullard (children)
Goodsell, Cumberland Island Holding Company

Right to use Shell Road:

Mary Bullard (children)
Goodsell, Cumberland Island Holding Company

Right to use North Cut Road:

Mary Bullard (children)
Goodsell, Cumberland Island Holding Company

Right to use Plum Orchard Spur Road:

Mary Bullard (children)
Goodsell, Cumberland Island Holding Company

Right to use all established roads and trails on CUIS so long as such roads and trails are open to any public vehicular traffic:

High Point, Inc. (29 stockholders)
Greyfield Ltd.

Right to access beach:

- Mary Bullard (children): explicit right of access for Mary Bullard (Mary Bullard also has the right to travel on the beach; this right terminates upon her death.)
- Nancy Butler (spouse and issue): right to construct pathway to beach
- Goodsell, Cumberland Island Holding Company: right of vehicular access to beach via Davisville Road; right to access a *beach walk* and bath facilities and an easement over existing roads to the beach; easement to the low water mark of the Atlantic Ocean
- Goodsell, Cumberland Island Holding Company: grant to Larry Phillips of non-exclusive easement to roads, to beach, and to the low water mark of Atlantic Ocean
- Grover Henderson (life estate): right to vehicular access to beach at Davisville Road only
- Margaret Richards (spouse and issue): right to have (foot?) pathway to beach
- Carol Ruckdeschel (life estate): right to access property located at north end of island via ocean beach so long as beach remains an open legal access; suggestion of a right to use beach as a means of ingress and egress to remainder of island in customary manner
- Thornton Morris (spouse and issue): beach access granted via NPS special use permit to access the Atlantic Ocean beach over the dunes via Southcut road only; permit expires September 30, 2000

- Table Point Co., Inc. (Perkins family-shareholder/owner and children): beach access granted via NPS special use permit to access the Atlantic Ocean beach over the dunes via Southcut road only; permit expires September 30, 2000

Under the Georgia Shore Protection Act, the State of Georgia has adopted rules to authorize the operation of motor vehicles on Georgia's dynamic dune field and beaches (beach driving). The rules apply to Cumberland Island and other beaches in the State and went into affect on May 1, 1999. Under these rules the State allows vehicle access to the beach only over State-approved designated routes from the upland. A detailed discussion of beach driving is included under the Beach Driving section of the WMP.

Relationship with Other Plans

The General Management Plan (GMP) of 1984 serves as the primary guiding document for the management of CUIS. The WMP tiers from the GMP and will be consistent with the general principles and recommendations of that document. In those instances where the WMP diverges from the GMP, the NPS will make changes to the GMP in the form of an amendment. The Draft Environmental Impact Statement identifies each amended item. The WMP will also be prepared to coordinate with other plans that tier from the GMP. A Resource Management Plan (Cultural Resource Management Plan and Natural Resource Management Plan), Long Range Interpretive Plan, and Commercial Services Plan are being developed concurrently with the WMP. The findings and recommendations of the other plans will be consistent with the appropriate elements of the WMP. The NPS will prepare additional plans identified in the WMP (such as a Fire Management Plan) that will be in compliance with the WMP.

WILDERNESS MANAGEMENT GUIDELINES

Context for Decision Making

The context for making difficult management decisions related to wilderness or other issues must be the relevant laws and policies affecting the park. Following are excerpts from the laws pertinent to the management of CUIS.

The NPS is directed by its 1916 Organic Act “to conserve the scenery and the natural and historic objects and the wildlife therein and to leave them unimpaired for the enjoyment of future generations.” The CUIS establishing legislation from 1972 directs the NPS “to provide for public outdoor recreation use and enjoyment . . . and to preserve related scenic, scientific, and historical values...[and] permit hunting, fishing, and trapping....” The establishing legislation also allows that:

[a]ny owner or owners of improved property on the date of its acquisition by the Secretary may, as a condition of such acquisition, retain for themselves and their successors or assigns a right of use and occupancy of the property for noncommercial residential purposes.... Except for certain portions of the seashore deemed to be especially adaptable for recreational uses, particularly swimming, boating, fishing, hiking, horseback riding, and other recreational activities of similar nature, which shall be developed for such uses as needed, the seashore shall be permanently preserved in its primitive state and no development of the project or plan for the convenience of visitors shall be undertaken which would be incompatible with the preservation of the unique flora and fauna or the physiographic conditions now prevailing, nor shall any road or causeway connecting Cumberland Island to the mainland be constructed.

The National Historic Preservation Act of 1966 declares that “the spirit and direction of the Nation are founded upon and reflected in its historic heritage; ... the preservation of this irreplaceable heritage is in the public interest so that its vital legacy of cultural, educational, aesthetic, inspirational, economic, and energy benefits will be maintained and enriched for future generations of Americans....” The National Historic Preservation Act further states that its policy is to “provide leadership in the preservation of the prehistoric and historic resources of the United States.... [and to] administer federally owned, administered, or controlled prehistoric and historic resources in a spirit of stewardship for the inspiration and benefit of present and future generations....”

In 1982 Congress established 8,840 acres as Wilderness and 11,718 acres were authorized as Potential Wilderness. “The wilderness area designated by this section shall be known as the Cumberland Island Wilderness. Subject to valid existing rights, the wilderness area shall be administered by the Secretary of the Interior in accordance with the applicable provisions of the Wilderness Act . . .”

The 1964 Wilderness Act provides a definition of wilderness.

“A wilderness, in contrast with those areas where man and his own works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain. An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man’s work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value.”

The Wilderness Act goes on to emphasize that its purposes “are hereby declared to be within and supplemental to the purposes for which . . . units of the national park . . . system are established and administered and [that nothing] in this Act shall modify the statutory authority under which units of the national park system are created.” Then the Wilderness Act declares that “each agency administering any area designated as wilderness shall be responsible for preserving the wilderness character of the area and shall so administer such area for such other purposes for which it may have been established as also to preserve its wilderness character. Except as otherwise provided in the Act, wilderness areas shall be devoted to the public purposes of recreational, scenic, scientific, educational, conservation, and historical use.”

The NPS *Draft Management Policies of 1999* establish service-wide policies for preservation, management, and use of park resources and facilities. The guidelines establish direction for management of NPS wilderness:

The National Park Service will manage wilderness areas for the use and enjoyment as wilderness. Management will include the protection of these areas, the preservation of their wilderness character, and the gathering and dissemination of information regarding their use and enjoyment as wilderness. Public purposes of wilderness will include recreation, scenic preservation, scientific study, education, conservation, and historical use.

Minimum Requirement Determination Process

Section 4 (c) of the Wilderness Act states that:

Except as specifically provided for in this Act, and subject to existing private rights, there shall be no commercial enterprise and no permanent road within any wilderness area designated by this Act and, except as necessary to meet the minimum requirements for the administration of the area for the purpose of this Act (including measures required in emergencies involving the health and safety of persons within the area) there shall be no temporary road, no use of motor vehicles, motorized equipment or motorboats, no landing of aircraft, no other form of mechanical transport, and no structure or installation within any such area.

NPS Draft Management Policies (Section 6.3.6) interprets the above statutory provision as:

All management decisions affecting wilderness must be consistent with a minimum requirement concept. ...When determining minimum requirement, the potential disruption of wilderness character and resources will be considered before, and given significantly more weight than economic efficiency and convenience. If a compromise of wilderness resource or character is unavoidable, only those actions that preserve wilderness character and/or have localized, short-term adverse impacts will be acceptable.

CUIS will use the procedures outlined in Table 1 to determine the minimum requirement for all activities affecting the wilderness resource. The minimum requirement process will be established as two-tiers. First, a determination will be made as to whether a proposed management action is appropriate and necessary for the administration of the area as wilderness and does not pose a significant impact to its wilderness resources and character. Second, if the project is found to be appropriate and necessary, the minimum requirement process will be used to determine the method (tool or technique) that causes the least impact to the physical resources and experiential qualities (character) of wilderness.

The objective of the minimum requirement analysis is to preserve the wilderness character of an area while managing for its public purposes. All proposed management actions including special uses, natural resources research and monitoring, cultural resources treatments, road and trail maintenance practices, facility placement, and equipment use will be evaluated through the minimum requirement assessment process.

The Wilderness Act prohibits specific activities, including motorized equipment use, aircraft landings, and structures or installations, when other reasonable alternatives are available. The minimum requirement analysis provides a formal process for developing

alternative solutions and evaluating and comparing each alternative's effects on wilderness character. The impacts on wilderness resources (ecosystem processes and components) from implementing the alternative must be considered. Also to be considered are effects on the experiential qualities of wilderness such as the preservation of natural conditions (including the lack of man-made noises), outstanding opportunities for solitude, a primitive and unconfined type of recreational experience, and the assurance that wilderness will be preserved and used in an unimpaired condition. Impacts on these elements are primary considerations in selecting the minimum requirement and will be afforded significantly greater weight than cost or convenience.

Each division will be responsible for preparing applicable minimum requirement determinations. The division chief will then recommend the determination for approval by the Superintendent. If a determination affects more than one division, the appropriate division chiefs will submit the recommendation jointly to the Superintendent.

Activities that are considered routine or non-routine but predictable have been evaluated using the minimum requirement process and are described in the WMP. Following approval of the WMP, these will be implemented without additional compliance following the identified (approved) methodologies.

Any proposed administrative activity that is not addressed in the plan but has the potential to affect the wilderness would be analyzed through the minimum requirement process. The process will determine if the action will be implemented and the tools or techniques that would be used. The analyses will clearly identify how minimum requirement decisions were developed and include reference to the applicable NEPA compliance documents (Categorical Exclusion, Environmental Assessment, or Environmental Impact Statement). Approval will be documented with the Superintendent's signature, and a permanent record of the analyses will be retained in park files.

Table 1
Wilderness Minimum Requirement Determination Process
for Cumberland Island National Seashore

TABLE 2

Considerations

Before making a decision about taking an action in the wilderness, the appropriate NPS managers and staff will be cognizant of the constraints imposed by the Wilderness Act, the Cumberland Island Wilderness Act, and other applicable laws, regulations, and policies.

1. Does your decision ensure that wilderness is not occupied or modified by humans?
2. Does your decision maintain or move wilderness toward less human influence, within legal constraints?
3. Does your decision allow wilderness to retain solitude and elements of surprise and discovery?
4. Did you ensure that your decision was not primarily based on economy, convenience, comfort, or commercial value?
5. Does your decision look beyond the short term to ensure that future generations will be able to enjoy the benefits of an enduring resource of wilderness?
6. Does your decision support the wilderness resource in its entirety rather than maximizing an individual resource within wilderness?
7. Does your decision recognize the unique character of this particular wilderness?
8. Does your decision ensure that the effects of human activities do not dominate natural conditions and processes?

AFFIRMATIVE ANSWERS PROTECT AND PRESERVE THE WILDERNESS

Management Activities in the Wilderness

The NPS will conduct only those activities within wilderness which are determined to be necessary for the administration and preservation of wilderness resources (natural and cultural) and character and the administration of the retained rights. These activities include important functions such as monitoring and protecting endangered species, accessing and preserving cultural resources, transporting volunteers, and managing fires. Although the list is long, many of the activities will not occur frequently. Some activities, such as bridge maintenance may occur once every five to ten years, while bridge inspections will take place once every other year. Others, like emergency responses and hurricane evacuation will happen rarely, and hopefully, not at all. On the other hand, turtle monitoring takes place daily during turtle nesting season.

The NPS provides a camp south of the Plum Orchard Mansion with a storage locker, shower, cabin, and water for recreational hunters. The NPS will phase out the hunt camp at this location and relocate it out of the wilderness at a later date. Its proximity to Plum Orchard is inappropriate for the future use of the historic complex. The hunt camp area will continue to be used by NPS staff and volunteers as a staging area and as an occasional overnight camp to conduct activities in the wilderness.

All activities are subject to a minimum requirement determination to decide how staff will travel to and from or through the wilderness, what tools will be used, how often the activity will be performed, or how many staff members will participate in the activity. Under many of the activities the WMP presents a series of alternatives to address how to carry out an action. The NPS has selected and indicated its preferred solution or preferred alternative. Each preferred alternative has been subject to a minimum requirement determination that best serves legal requirements and management of the wilderness. The NPS will develop minimum requirement determinations for other activities on a case-by-case basis

Minimum Requirement Determination: Ranger Division Activities

Most ranger division activities take place in the more developed day-use area on the southern portion of the island and on the mainland in St. Marys; however, many of the recurring management activities occurring in the wilderness fall within the responsibilities of the ranger division.

Visitors' compliance with wilderness values and regulations may best be achieved when rangers and other trained staff contact visitors before they enter the wilderness and during their journey in the wilderness. The NPS prefers preventing a violation rather than performing active law enforcement in the wilderness. When law enforcement is needed it should be based on the impact of the objectionable behavior rather than on the transgression of a regulation or rule. This approach requires that park staff fully comprehends the reasons for wilderness management action and be able to relate them to visitors.

The public will have difficulty identifying with wilderness principles if they do not see NPS personnel practicing these principles. Ranger activities employing the minimum tool might in some cases be difficult, particularly if they involve less reliance on mechanized equipment; however, controlled access and prescribed visitor use levels offers a reasonable opportunity to demonstrate wilderness principles in practice.

The major issues concerning ranger division activities in the wilderness include:

- Vehicular use by inholders and retained rights holders warranting the use of vehicles to perform wilderness law enforcement; and
- Changing use patterns caused by boat access in the wilderness altering the type or amount of wilderness law enforcement.

The following management actions were evaluated in light of the minimum requirement process:

Transport Volunteers and Work Groups for Trail Maintenance and Other Work Projects

The action is to maintain trails, trail signs, boundary markers, dune crossing markers, and other work projects in the wilderness. For example, volunteer work groups currently stay at the hunt camp. Groups stay from 3 to 10 days on work projects. They typically arrive by ferry and hike to the hunt camp (7.5 miles), while park staff transports their gear by truck to the hunt camp. National Park Service staff employees also shuttle personnel and tools between the hunt camp and the work location trailhead.

Alternative 1 (Preferred): Volunteers would stay at the hunt camp area or at temporary camps near work sites. The NPS would transport people and gear to the wilderness boundary or by boat to Plum Orchard. Workers would then hike to the wilderness campsites. Workers would hike from the camp to the work site carrying tools and supplies and would use hand tools to minimize the evidence of work. Markers and signs would continue to be of an unobtrusive design.

Alternative 2: Continue as present. Workers hike to the hunt camp and back to the south end. The NPS transports gear by truck to the hunt camp. The NPS drives workers and tools to and from the hunt camp and the work location. Markers and signs are unpainted routed wood or brown carsonite. Turtle nest markers are white like the sand.

Alternative 3: Workers would camp in the wilderness. The NPS would transport people and gear either to the wilderness boundary by vehicle or to the hunt camp area. From there, workers would backpack to the camp areas. Workers would hike from the hunt camp to the work site, carrying tools and supplies. Workers would use hand tools to minimize the evidence of work. Markers and signs would continue to be of an unobtrusive design.

Conduct Law Enforcement Patrols

Patrolling the wilderness protects resources, ensures compliance with commercial and residential uses, protects wilderness values, monitors wilderness conditions, and educates visitors and residents about wilderness values and resources. Patrols areas include roads, trails, beaches, shorelines, camp areas, and historic sites. The GMP allows for the use of horses for beach or wilderness patrol. However, prior attempts to use horses on the island resulted in an extraordinarily high allocation of resources devoted to the care and maintenance of the animals compared with the time allocated for patrols.

Alternative 1 (Preferred): Protection rangers would drive on the Road System and the beach, i.e. where island residents drive. Foot patrols would increase when few residents are on the island. Rangers would patrol all other areas and trails on foot. The NPS would use vehicles to reach trailheads but would then park and proceed on foot. Rangers would park vehicles in unobtrusive places during patrol. Vehicles would not be parked overnight. In the future, as the number of retained rights holders driving in the wilderness decreases, the number of vehicle patrols would be decreased proportionately. The NPS would establish a tracking system for vehicle use.

Alternative 2: Protection rangers would drive on the Main Road from the south wilderness boundary to Plum Orchard. Rangers would hike to trailheads for patrol. Wilderness rangers would patrol some trails and camp areas on multi-day camping trips.

Alternative 3: Protection rangers would hike the trails and the beach. Rangers would reach the north end by boat and reach trails and camp areas by foot. Wilderness rangers would patrol trails and camp areas on multi-day camping trips.

Manage Recreational Hunting

In the autumn and winter the ranger division manages recreational hunts. The rangers provide camp facilities at Brickhill and the hunt camp at Plum Orchard (outside the wilderness) that includes rest rooms and a meat cooler.

The NPS uses the hunts to collect data, manage deer populations, and provide a mandated recreational opportunity. The NPS manages the hunts for safety, resource protection, and visitor education. Rangers close the wilderness area to other visitors during the hunts. Residents continue to use the wilderness area at their own risk.

The Visitor Use Activities and Levels: Recreational Hunting section of the WMP evaluates several alternatives.

Manage Access to Half Moon Bluff and Cemetery

The cemetery at the north end of the island (the Half Moon Bluff area) is still active. Occasionally, relatives of the deceased (African-American and Caucasian) visit the area.

Additionally, descendants of the African-American community that was located at Half Moon Bluff request access to visit the home of their ancestors.

Alternative 1 (Preferred): Upon request, the NPS would transport relatives and descendants to the north end by boat. From there, the NPS would transport these people by low emission vehicle to the Settlement or to the cemetery.

Alternative 2: Upon request, the NPS would transport relatives and descendants from Dungeness or Sea Camp dock to Half Moon Bluff by low emission vehicle.

Alternative 3: Upon request, the NPS would transport relatives and descendants to Plum Orchard by boat. From there, all members of the party would walk through the wilderness to Half Moon Bluff.

Conduct Emergency Operations

NPS personnel will protect visitors and residents during natural disasters, critical searches, rescues, and medical emergencies. They will assist visitors during non-critical incidents, such as lower level medical situations, hikers separated but not in danger, at-home emergency notifications, and assistance to other agencies.

NPS rangers will use vehicles when needed to warn residents, campers, and employees of hurricanes, fires, and other crises. Evacuation will be performed using the most effective and expeditious means. Vehicles will be used when needed to locate, assist, and evacuate lost people and injured visitors in life-threatening situations. During non-critical incidents vehicles will be used under the same minimum requirement determination selected for law enforcement patrols.

Manage Fire and Fire Danger

While firefighting includes the transportation issues addressed in other actions, it also has the potential to have a direct and lasting impact on the resource and the visitor experience. The Fire Management Plan will address minimum requirement, but until the NPS formulates that plan, transportation associated with fires will be covered under the guidelines for law enforcement and emergencies. Firefighting will be decided on a case-by-case basis in order to accomplish the full suppression mandate of current fire policy with minimum impact on wilderness resources. The NPS will manage fire and fire danger to protect resources and historic and residential structures, ensure employee safety, protect wilderness values, and ensure compliance with agency and Department of the Interior policy.

No permanent heliports, helipads, or airstrips will be allowed in wilderness. Temporary landing facilities may be used to meet the minimum requirement of emergency situations. Site improvements determined to be essential for safety reasons during individual emergency situations may be authorized, but the site will be restored to natural conditions after the emergency. When possible, aircraft would be used to suppress fire rather than

relying initially on ground crews. Likewise, aircraft would be employed to orient firefighters to the wilderness areas of the island.

During lightning season the park will work with the sophisticated detection systems at Okefenokee National Wildlife Refuge and Osceola National Forest to identify lightning strikes. The NPS will also contact the State of Georgia Forestry Commission to use its fixed-wing aircraft to detect lightning strikes.

Alternative 1 (Preferred): Fire response and detection vehicles would drive on the proposed Road System, the beach, and the access roads to residences. Vehicles would be used to reach trailheads. From there firefighters would travel on foot cross-country or on trails. Firefighters would primarily use hand tools. Because of the dense vegetation and flammable fuel types, employee safety may require the use of power saws and water transport to manage fires and safety lines quickly.

Fire prevention (i.e. educating island residents about fire safety) would not be classified as an emergency function. This task would be carried out on foot.

Alternative 2: Fire personnel would hike to fires and would only use hand tools. Fire prevention would be carried out as in Alternative 1.

Minimum Requirement Determination: Resource Management Activities

The Resource Management Division performs activities throughout the island including the wilderness area. One key task is to monitor and implement strategies to maintain long-term ecological processes. Staff also protects endangered species, develops strategies to control and remove non-native (exotic) species, and surveys wildlife populations. Because staff is also responsible for cultural resources, it monitors and implements strategies to preserve archeological sites, historic structures, and cultural landscapes. The staff promotes and coordinates research activities and reviews projects to assess impacts on park resource values, Federal laws, and guidelines. The staff will also monitor wilderness character (quiet, naturalness, solitude) and use. Many of these activities occur, in, and are necessary to understand and protect the wilderness but must be conducted sensitively to respect wilderness values. Specific actions to support these activities were evaluated using the Minimum Requirement Determination Process.

Access, Monitor and Protect Endangered Species

Sea turtles: The goal of this program is to enhance nesting success along the beaches according to the Loggerhead Sea Turtle Recovery Plan. Mitigation is necessary. Approximately two-thirds of the beach is located within the Cumberland Island Wilderness. The remainder is not located in the wilderness. Because the Endangered Species Act of 1973 mandates protection of the Loggerhead sea turtle rapid access to the wilderness. The procedure entails daily patrols along the length of the beach from approximately May 1 through October 30. In addition to monitoring the number and location of nesting activities, the staff protects nests and hatchlings by screening nests,

relocating nests, and removing predators (raccoons and feral hogs). The staff unearths each nest after hatching to determine hatching success and cause of any failures.

Alternative 1 (Preferred): The NPS would continue the above procedure employing two turtle technicians. Patrols would be conducted along the beach from a base on the south end of the island. One to two people using a vehicle (Kawasaki Mule or all terrain vehicle [ATV]) would confine trips to one a day. Because the Geographic Positioning System (GPS) is not sufficiently accurate, the turtle technicians would install small wooden stakes, painted white, to mark the nests. Nests would be protected from raccoons and other predators by installing metal screening over one-third to one-half of the nests. Occasionally the turtle technicians would install small mammal traps to catch and remove raccoons that have learned to eat turtle eggs. Until the NPS implements a hog removal plan, rangers would continue eliminating feral hogs that depredate sea turtle nests.

Alternative 2: The NPS would monitor the turtle nests on foot. Eight additional employees (in three wilderness camps of two employees each with two others to cover days off for those in the three camps) would be needed. The camps would be located so that a team would monitor a specified area daily. The NPS would transport supplies and materials to the camps over the beach in low emission vehicles. Nest marking and protection, periodic mammal trapping, and hog elimination would proceed as in Alternative 1. After a year, the NPS would evaluate the results of the program to determine if additional personnel would be required to cover the territory.

Wood Stork: The goal of this activity is to enhance nesting success and to protect habitat. Because the Endangered Species Act of 1973 mandates the protection of the wood stork and the nesting colony is in the Sweetwater complex of Lake Whitney, rangers need wilderness access. Nesting habitat is checked in early May. If there is insufficient water under the nesting trees for alligators, mitigation to protect nests from raccoons may be necessary. Mitigation would entail constructing metal cones around nesting trees. Weekly monitoring is necessary from early May through mid-July to count nesting pairs and fledglings.

An NPS staff person or intern will reach the nesting areas on foot. Because the forest understory is so thick, reasonable access can be gained from the beach and South Cut Road. One staff member will make a weekly trip. This can often be accomplished in conjunction with turtle patrols, eliminating the need for additional trips. The GPS provides sufficient accuracy to locate wood stork sites. Occasionally, personnel will install metal flashing around trees.

Least terns: The goal of this activity is to enhance nesting success. Mitigation is sometimes necessary. Some nesting of least terns occurs in the wilderness. This activity entails a trip every three days along the length of wilderness beach from approximately May 10 through mid-July. In addition to monitoring nest and colony locations, the park will also monitor the effects of human disturbance and the presence of predators. Protection activities will include posting educational signs declaring an area closed and

trapping raccoons. Biologists also will monitor nesting success of Wilson's plovers and American oystercatchers, both regional species of concern.

One staff member will make a trip on foot at least every three days. The person will camp or stay at the Alberty House. Natural beach debris will be used to mark nests. Occasionally, small mammal traps will be installed to catch and remove raccoons that are depredating the nesting colony. The NPS will install signs at the colonies to deter disturbance by boaters, hikers, or vehicles.

Access, Monitor and Control Non-Native Species

Feral hogs: The goal of this activity is to reduce significant degradation to threatened, endangered, and other native species and communities, and to wilderness character. Feral hogs throughout the National Park System have been shown to destroy habitat, compete with native species for food, and eat the eggs of ground nesting animals. Mitigation is needed. The hogs can produce four litters of 6 to 10 per year. If the feral hog population is reduced in number, monitoring and control actions will continue forever. If they are eradicated, no further actions will be necessary. Eradication will entail short-term degradation to wilderness values. NPS policy promotes controlling or eradicating non-native, feral species that cause significant adverse impacts to the park's resources. The NPS will prepare an Environmental Assessment addressing this effort.

The NPS proposes to eradicate hogs by relying on increased hunting during the managed hunt program. The NPS will also use fencing, pulsed hunting and trapping, hog dogs, and radio-collars. The NPS will use trucks to enter the wilderness. If the NPS can acquire four-wheel drive electric trucks that can operate on the island effectively, yet reduce noise and pollution, they will become the vehicles of choice. If other methods are unsuccessful, the NPS may install fencing, invisible where possible, to fragment the wilderness into smaller, workable parcels.

The NPS will need daily access for fence monitoring and hog eradication. Two staging areas, the hunt camp area for the south half of the wilderness and a north end base, will provide lodging for workers. Pulsed control efforts will be implemented so hogs do not get used to a pattern. Other tactics include: 1) alternating hunting and trapping to improve effectiveness; 2) using bait to draw hogs to traps and hunters; and 3) using dogs and radio-collaring to remove remaining hogs. To ensure visitor safety the NPS may occasionally close areas.

Feral horses (monitor population trends): The goal for this island-wide activity is to monitor the horse population size, distribution, and impacts. There is currently one annual one-day census of the population; however, the ground-count may continue for two additional two for one count area to obtain numbers missed. To avoid double counting, multiple teams cover the island over a 4-hour period. Currently, three teams of up to four people drive along the Main Road to their start area and walk the wilderness trails. One team flies over the wilderness in a helicopter concentrating on the inter-dune

and marsh areas not accessible to ground counters. When the helicopter is not available, a team drives the beach to look at the inter-dune on foot.

Alternative 1 (Preferred): Five teams of up to four people would reach the hunt camp as the staging area by boat. In the wilderness, all teams would proceed on foot to count the horses and camp at various locations, such as the designated wilderness camp areas. The teams would accomplish this task over three days.

Alternative 2: The NPS would continue the current action with the following modifications. Five teams of up to four people would reach the hunt camp (the staging area) by boat. In the wilderness, three teams of up to four people would use two electric vehicles or one electric vehicle and one helicopter. One team would be on foot. The teams counting in the south end of the island would leave the hunt camp by vehicle. The teams would accomplish this task during a four-hour period on a single day.

Feral horses (management): Although a non-native species, the feral horses have become a symbol of Cumberland Island National Seashore to many people. Despite their allure the horses continue to degrade island resources, especially the marshes and the dunes. In order to abate the damage, the NPS proposes several alternatives based on management area, herd size, and method.

Alternative 1 (Preferred): Maintaining a self-regulating herd (60 to 120 horses) island-wide would be accomplished through removal and birth control. The NPS would manage the herd to reduce the number of horses in the wilderness.

Alternative 2: Maintaining a representative herd outside of the wilderness area would require removal of horses in the wilderness and establishment of a fence to prevent reentry. A self-regulating herd of 60 to 120 would be maintained through birth control and/or removal.

Alternative 3: The NPS would maintain a small, self-regulating herd on the south end of Cumberland Island from just north of Sea Camp through fencing, removal, and birth control.

Alternative 4: No action would be taken.

Feral horses (monitor impacts): The goal of this activity is to measure and evaluate the changes to the ecosystem from horse grazing and trampling. This will be accomplished by installing permanent small (about 180-square foot) fenced enclosures to keep the horses out of an area and using vegetation sampling techniques to compare plant height, diversity, and cover to an adjacent control area. Nine of these enclosures in wilderness will remain as long as there are horses in wilderness. They are sampled on differing frequencies (quarterly, annually, every two years) depending on habitat. Researchers, NPS staff, and interns will camp and walk to these areas on foot because minimal sampling gear is needed (PVC quadrats, cameras, meter tape, small temporary flags, GPS).

Access and Survey Native Wildlife

White-tailed deer: Deer is a hunted native species. Public Law 92-536 mandated recreational hunting in accordance with Federal and State laws and regulations. Four recreational deer hunts are conducted annually. The goal of this activity is to monitor the health, age structure, population size, and habitat of the white-tailed deer, while providing recreational hunting opportunities. Park personnel note the gender, health, size, and age of each deer. A jaw is taken for use in obtaining exact ages where possible. Every three years, one to two park staff members sample vegetation transects to evaluate the condition of the forest understory browsed by deer.

The NPS will conduct its monitoring and assessment process in the following way. An NPS employee or intern will monitor the animals harvested by the hunters at an area near the Plum Orchard dock. This person will access the browse transects by walking from wilderness camp areas using a GPS. (The transects are not on a trail and are marked by small wooden stakes.)

Christmas Bird Count and Monitoring Bird Populations

Monthly monitoring of birds and the annual Christmas bird count are presently performed using vehicles. Effective immediately, the wilderness portions of the survey will be performed on foot. Access may be gained by boat to Plum Orchard or the northern sections of the island. Counters will hike to and camp in the wilderness.

Access and Conduct Long-Term Monitoring of Indicators of Ecological Processes and Systems

Monitoring is the systematic gathering, comparing, and evaluation of data to establish baseline conditions and determine the degree of change. Change due to natural ecological processes inevitably occurs in wilderness. The goal of this activity is to improve the understanding of the flora, fauna, and ecosystems and the type and amount of natural change. Specific indicators of important ecosystems or functions reflect important attributes of biological and physical conditions in wilderness and the park as a whole. The NPS has designed a monitoring system to conduct multiple studies concurrently at each study site. Protocols for initial studies have been written, are being tested, and will be peer-reviewed. Those involved in the monitoring effort for most studies stay overnight at the Dungeness dormitory or hunt camp. Access to begin each monitoring activity will require vehicles (electric when possible) and equipment. Long-term monitoring entails a minimum number of tools and equipment.

The NPS will use five linear band transects (South End trail, Little Greyfield, Duck House, South Cut Road, and North Cut Road) and/or additional randomly established points in each square kilometer of the UTM coordinates established in the 1979 USGS topographic map series. Staff will use GPS to find sampling locations instead of using multiple path markers. Using a one- to five-day survey, staff will monitor indicator fauna

and flora annually. When surveys and sample evaluation (bacteria and nutrients) are time-dependent, staff will gain access to the transects or established points by electric vehicles along the beach, North Cut Road, and the Main Road. To conduct annual vegetation and wildlife sampling staff will walk and camp in the wilderness. Each monitoring team will consist of no more than four members.

Access, Monitor and Preserve Cultural Resources

The goal of this activity is to preserve the park's cultural heritage in or surrounded by wilderness. There are two historic districts on the National Register of Historic Places adjacent to or located within the wilderness: Plum Orchard is carved out of the wilderness and High Point/Half Moon Bluff is located within the wilderness. Plum Orchard may be reached over the Main Road and Plum Orchard Road or by boat. High Point/Half Moon Bluff can only be reached by going through wilderness. The National Historic Preservation Act and Section 4a(3) of the Wilderness Act mandate preservation of these resources.

Archeological sites are monitored for illegal digging and salvage and effects of coastal erosion. Archeological and historic sites located off trail are monitored annually, while sites located at wilderness camp areas or in historic districts are checked more frequently. Photo-points are used to monitor site condition. Any archeological work may require consultation under the Native American Graves Protection and Repatriation Act (NAGPRA) or tribal consultation.

Archeological assessments are needed to evaluate the extent and worth of subsurface resources. They are performed in response to a proposed project that would require ground disturbance. The archeological team would reach the area in the wilderness from the nearest dock and walk to the site. An electric vehicle would transport equipment and materials. Teams would either camp near the site or stay at the hunt camp or Alberty House (if it is renovated for use by the NPS) and walk to their work sites.

Historic structures are the most obvious remnants of our cultural resources. They also require the highest level of mitigation and care. Repairs and stabilization work on structures in wilderness, in keeping with an approved Cultural Resources Management Plan (CRMP), may occasionally necessitate the use of motorized equipment. All such instances will be based upon a minimum requirement determination. Access will be by the proposed road system, a proposed north end dock, or the Plum Orchard dock. Construction and vehicle noise will degrade wilderness experience; therefore quiet technology electric vehicles will be used where possible. The number of trips can be minimized. Monitoring activities are less intrusive. Photo-points are used to monitor general condition. The need for repairs is also noted.

Cemeteries are monitored annually for general condition, need for repairs, and defacement. Photo-points are also used for them. Access is as for archeological sites.

A portion of the park's museum collection is currently housed in wilderness at Carol Ruckdeschel's residence in the HighPoint/Half Moon Bluff Historic District. The park curator monitors this collection monthly. Access is by vehicle.

In the future the NPS, at a minimum, will monitor all areas annually. Staff will walk to all locations and may spend the night at the Alberty House or the hunt camp or camp in the wilderness. In some cases access to the north end of the wilderness will be by boat. The patrol ranger will receive training in order to perform some monitoring of historic structures and archeological sites during regular patrols. The park curator will continue to monitor museum collections and the cemeteries as at present. Monitoring teams will be limited to one to three members. (Teams may consist of members of different park divisions.)

Staff monitoring Plum Orchard and adjacent areas will reach Plum Orchard by boat and proceed on foot. Areas at the north end of the island may eventually be reached by boat at a proposed north end-landing site. Staff will then proceed to their assignments.

Access for Proposed Compliance Projects

The goal of this activity is to ensure that the project will not degrade park resources or violate any Federal law. Through the normal planning process, sufficient time will be allowed to access a location on foot. When an activity is time dependent, access will be by electric vehicle along the Main Road and North Cut Road. From these points, the team of 1 to 3 people will walk. Technical experts and other park personnel may accompany the resource management person. As in the monitoring of the cultural resources, minimal equipment (camera, measuring device, GPS) will be used. Access may be needed more than once initially to develop the appropriate documents for review. Once the project is approved and begins, occasional access will be needed to monitor the impacts of the project on the resources. This activity is mandated.

Access and Conduct of Occasional Research

The goal of this activity is to improve understanding of wilderness resources so that management decisions are based on the results of scientific investigations. There is an application process for researchers wishing to conduct research or make a collection. Requests are reviewed on a case-by-case basis and approved based on sound science and wilderness dependence.

The NPS *Draft Management Policies* and *Director's Order #41, Wilderness Preservation and Management*, provide guidance for scientific activities' protocols. The NPS will assess each project according to minimum requirement determination protocols: 1) to determine whether a project is appropriate and necessary for the purpose of wilderness and 2) if it is appropriate, to select the technique or tool needed to accomplish the task while producing the least impact.

Active manipulation of wildlife or the environment and bright colored tagging are generally not acceptable. Instrumentation may be necessary to record accurately the

scientific parameters being sought, although as a general rule it is not considered in keeping with wilderness character. The scientific community is encouraged to design investigations in wilderness to seek essential data and is governed by a wilderness ethic – do only what is necessary and use the minimum methods, approaches and tools. Projects will be designed to access locations by walking. Occasional staging of equipment may necessitate using an electric vehicle. Researchers may camp overnight in the wilderness or stay at the Alberty House.

The greatest scientific values of wilderness are based on the opportunity to study, over long periods of time, large, relatively undisturbed ecosystems. Three wilderness research topics are a high priority because they focus on wilderness conditions of naturalness and solitude:

1. response of both habitat and native animals to massive natural disturbance (hurricane, fire);
2. normal predator-prey relationships; and
3. natural baselines for comparison with managed conditions

Access and Monitor Wilderness Character and Impacts From Visitor Use

Monitoring of biological and physical attributes is covered under the long-term monitoring program. This goal of this activity is to monitor social conditions in wilderness. Under the Limits of Acceptable Change approach, baseline conditions are developed and monitored to determine the degree of change occurring in various wilderness campsites and trails. The management objective is to maintain both ecological integrity and human use and solitude.

The NPS will monitor the use and impacts at various wilderness locations:

- develop and annually re-take photo-points of campsites and trails;
- monitor annually each campsite for deterioration by measuring soil compaction, denuding and proliferation of social paths, exposed and protruding tree roots, amount and type of litter, and number of “cat” holes dug for human waste;
- maintain visitor use numbers;
- maintain a log of visitor contacts and analyze the comment section of the guest book at the Sea Camp Ranger Station to get an indication of the visitor’s wilderness experience;
- monitor noise levels monthly; and
- look for unnatural wildlife behavior or distribution as an indicator of inappropriate visitor behavior or too many visitors.

To experience the wilderness as a visitor would, the NPS person will walk to the locations. A single person will perform this task.

Minimum Requirement Determination: Maintenance Division Activities

Road Grading to Plum Orchard

Alternative 1 (Preferred): The NPS would use a small grader to maintain the Main Road open from the southern boundary of the wilderness to its junction with Plum Orchard Road. The grader would continue its work on Plum Orchard Road. The task would be performed quarterly or more often if conditions warrant preserving the historic integrity of the Main Road. This activity would continue on this schedule until such time as boats replace overland vehicles as the primary means of transportation. At that time road grading to Plum Orchard would be reduced proportionately to accommodate the number of overland vehicular trips.

Alternative 2: The NPS would not grade the Main Road from the southern boundary of the wilderness to its junction with Plum Orchard Road. The spur road to Plum Orchard also would not be graded. Grading would take place only when safe passage could not be assured and to preserve the historic integrity of the Main Road.

Main Road Storm Clearance/Emergency Road Clearance

Alternative 1 (Preferred): Upon the basis of the NPS obligation to keep the Main Road cleared for passage by island residents, the NPS would remove major road obstacles, in most cases fallen trees. Plum Orchard would serve as a staging area to bring staff and equipment into the wilderness. The proposed north end access may also be used to get staff to that portion of the island. In case of emergencies and to minimize the number of trips, the NPS would use the least intrusive type of vehicle to transport staff and equipment to the location. During emergencies power tools may be employed to remove obstacles. For other cases, staff would travel by foot and use non-powered means to remove obstacles. NPS personnel may need to camp in the wilderness or stay overnight at the Alberty House during these activities.

Alternative 2: The NPS would, in all cases, use motorized equipment in support of the residents' rights to use the roads. Staff would be able to return to Dungeness rather than camping in the wilderness or staying overnight at the Alberty House.

Bridge maintenance and inspection: Five heavy-duty wooden bridges will replace the culverts at streams and water crossings along the Main Road in the wilderness. These bridges will replace culverts, which impede the natural water flow. Because the Federal Highway Administration (FHWA) classifies the Main Road as a park road, it is obligated to conduct annual inspections of the bridges.

In both alternatives, once every two years, two FHWA engineers would travel to CUIS to evaluate the safety and condition of the bridges. Based on the FHWA evaluation, the NPS would make the required repairs. Because the bridges are new, it is not anticipated that repairs would be needed for 5 to 10 years.

Alternative 1 (Preferred): The NPS would transport the engineers to Plum Orchard or to the north end by boat, and they would proceed on foot to the bridges. If necessary the engineers would camp overnight in the wilderness. In all likelihood, most of the required repairs work would be minor and staff and materials could get to the locations on foot. In major cases, the least intrusive vehicle would be used to bring equipment and materials to the site.

Alternative 2: The NPS would transport the engineers to Plum Orchard or to the north end, and they would proceed by electric vehicle to the bridges. Staff and materials for repairs would get to the locations by electric vehicle.

Gathering Water Samples

For public health purposes, the NPS must take samples at the camp area water sources monthly. In accordance with the guidance provided by the U.S. Public Health Service, the park will obtain two samples monthly unless a public health consultant decides to reduce it to one sample monthly. The decision to change the number of monthly samples would be based on: 1) 12 months without a positive bacteriological result and 2) chlorine residuals within 0.2 to 0.6 parts per million. If the water system is not chlorinated or does not maintain sufficient chlorine residual, then two bacteriological samples will be required. This activity supports use of the wilderness by visitors who cannot practically backpack into the wilderness without the NPS providing freshwater wells.

Because this is a time dependent activity, the NPS must perform this task in the most expeditious manner. The NPS will use an ATV or electric vehicle to reach the camp areas, gather the samples, and return them to the south end for testing. When the sample may be collected and returned for testing within the allowable time limit without using motorized transportation in the wilderness, the NPS staff member will use a vehicle or boat to reach the wilderness and then walk to the camp area.

Structural Maintenance

Several national register districts exist in or near the wilderness: Plum Orchard (located next to the wilderness), High Point/Half Moon Bluff, and the multiple archeological sites. Historic structures will require the most intervention with the potential to degrade wilderness values. As a general rule, the NPS or its agents (e.g. a lessee at Plum Orchard or volunteer groups) may use power tools to perform the initial treatment activity on the historic resources, i.e. to establish the initial standard condition. Major cyclic maintenance projects, such as a large-scale re-roofing, may also involve the use of power equipment).

Plum Orchard: Until a historic property lease is executed and Plum Orchard is restored, the NPS will station a maintenance employee at Plum Orchard to enhance the day-to-day care and preservation of the mansion and grounds. This employee will attend to routine functions at Plum Orchard and other historic structures in the wilderness. This person will primarily depend on boat the travel between Plum Orchard and the south and north ends of the island, thus reducing the likelihood of vehicle traffic along the Main Road and the Plum Orchard spur road in the wilderness.

Alternative 1 (Preferred): The NPS would construct a loading ramp at the Plum Orchard dock to assist in most of the loading and unloading of materials.

Staff, equipment, and materials needed for repair and maintenance would be brought by boat to the Plum Orchard dock. As more and more activities emanate out of the Plum Orchard dock and the hunt camp staging area, the frequency of maintenance at and trips by boat would increase. Hand tools would be the preferred choice for repair and maintenance to reduce the potential effect on the surrounding wilderness values, however, power tools may be used when necessary.

Alternative 2: To minimize use of the Main Road by vehicles the NPS will employ the Plum Orchard dock as the principal receiving point for equipment and supplies. Whenever possible staff will prepare materials at Plum Orchard prior to transport to the particular historic resource. The NPS will use the necessary tool here to execute the selected preservation treatment on the Plum Orchard structures and on its landscape features. Careful planning and site work will reduce (and strive to eliminate) the need to use power tools at structures within the wilderness.

North End Cultural Resources: Alternative 1 (Preferred): The NPS or its agents would walk from Plum Orchard or the proposed north end dock to historic resources in the wilderness to perform routine preservation tasks and make repairs using hand tools. The NPS would use power tools and equipment sparingly. The NPS would haul by vehicle unusually large pieces of material and equipment if necessary. Periodic inspections of the structures would reduce the need to conduct a large number of major maintenance activities and keep the repairs to small jobs. The NPS would depend upon volunteers and partners to conduct some of these maintenance functions.

Travel to and from cultural resources located within the wilderness to plan for, assess, and evaluate the preservation of historic structures would be by foot. Staff or others involved in these activities would follow the administrative work group guidelines.

Alternative 2: The NPS would depend upon low impact vehicles to transport materials and staff from the Plum Orchard and north end docks to the cultural resources in the northern portion of the wilderness. The NPS would use hand tools to make needed repairs.

Number of Weekly Trips to Restore and Maintain Plum Orchard

Using the minimum requirement process and following the concept of “no net increase in impact,” the NPS has determined the average number of weekly trips needed to restore and maintain Plum Orchard. The term “no net increase in impact” means that level of impact reasonably anticipated if the NPS were meeting its obligations to restore, maintain, and preserve Plum Orchard Mansion and provide visitor access and interpretation at least equal to that of the prospective tenant. In some circumstances, the NPS will require a vehicle travelling between its operation at Dungeness or Sea Camp

and Plum Orchard. Until full facilities are available, the NPS will continue driving from the southern wilderness boundary along the Main Road and the spur road to Plum Orchard. Full facilities include adequate docking and loading and off-loading ramps (designed to accommodate a garbage truck or dump truck not to exceed 50,000 pounds), boats to haul equipment and machinery, and boats to carry staff and visitors.

The NPS is considering several options for an outside party to operate, maintain, and make Plum Orchard available to the public. The NPS will issue a Request for Proposals (RFP) to solicit interest in this venture. Because Plum Orchard is listed on the National Register of Historic Places, the NPS may make it available under the Historic Leasing program, but may also consider a concession or a field school. The NPS will transfer its responsibility to operate and maintain the facility to the successful bidder, including the calculated number vehicular trips. Both the NPS and its proposed agent will be mindful of Congress' caution that use of the roads in the Cumberland Island Wilderness will be **special and limited**. The RFP will be announced concurrently with the review of the WMP.

The NPS has identified the types of tasks it will perform during the restoration and operational phases of Plum Orchard. During the restoration phase, the NPS estimates that about 34 vehicular trips weekly to Plum Orchard will be needed by the construction and restoration crews (including the moving of materials and equipment), supervisors and architects, those retrieving materials and tools from the Dungeness maintenance shop, the curatorial staff, and construction supervisors. During the operational phase, the NPS estimates that interpreters (and visitors), custodial workers, curators, maintenance staff, and supervisors will make about 27 trips weekly to Plum Orchard. Occasionally, the NPS will transport equipment and materials for cyclic maintenance projects.

The estimated number of trips identified for the restoration and operational phases of Plum Orchard represent the number of proposed trips needed by vehicle. These estimates take into account that most shipments arrive by boat, and visitors arrive by boat or by foot. The numbers may fluctuate on a weekly basis; the numbers 34 and 27 represent a weekly average. Any substantial fluctuation from these averages will be subject to a minimum requirement determination.

Determining NPS access to Plum Orchard is guided by its obligations under the Wilderness Act, the Cumberland Island Wilderness Act, and the National Historic Preservation Act. Plum Orchard is bordered on three sides by wilderness, and Congress urged the NPS to use boat transportation for its preservation tasks. Therefore, the NPS has applied the minimum requirement process to determine the number of overland trips to Plum Orchard once full facilities become available. During the construction-restoration phase, the NPS estimates that it will make about five round trips weekly. During the operational phase, the NPS will make about three round trips weekly. Under the concept of "no net increase in impact," the occupant will follow the practice of the NPS if it were to preserve, restore, and operate Plum Orchard.

To ensure that trips through the wilderness will be kept to a minimum, planning and scheduling ahead will dictate that staff not involved in the direct transportation of material and equipment will travel to Plum Orchard by boat either from Dungeness or the mainland. Usually the NPS will bring materials and equipment directly from the mainland to Plum Orchard. For safety reasons and to avoid double loading and unloading, vehicles will occasionally be needed to transport equipment and materials from Dungeness to Plum Orchard.

Although the NPS or its agents may use the Main Road and Plum Orchard Road to transport staff and materials to perform the selected preservation treatment and large-scale cyclic maintenance projects on the structures and landscape at Plum Orchard, every attempt will be made to use boats for these purposes. The NPS or its agents will use boats landing at the Plum Orchard dock for routine maintenance activities.

Minimum Requirement Determination: Resident-Related Activities

Frequently, island residents request that park staff come to their residence in the wilderness to discuss an issue concerning their property, their rights, or other island matters. Sometimes the CUIS staff drives to the residence; on other occasions island residents will drive through the wilderness and meet with the NPS at the south end of the island. To place parameters on the location and transport to a meeting with residents, the NPS has developed the following alternatives:

Alternative 1 (Preferred): When the subject of the meeting is site or time dependent, the NPS employee(s) would drive to the residence. Driving would involve one round trip, and a low impact vehicle would be used when possible. When the subject of the meeting is not site or time dependent, the resident would meet the NPS employee at a non-wilderness site.

Alternative 2: Regardless of site or time dependencies, the NPS employee(s) would walk to the residence from Plum Orchard or the north end dock. An overnight stay at the island residence, Alberty House, or camp area may be necessary.

Alternative 3: When the subject of the meeting is site or time dependent, the NPS employee(s) would request to meet the resident at a site out of the wilderness or at the north end and proceed in the resident's vehicle. Driving would involve two round trips. When the subject of the meeting is not site or time dependent the NPS would request that the resident meet the NPS employee(s) at the south end. Driving would involve one round trip.

Administrative Facilities

Road System

Definition of Road System

There are no public thoroughfares or roads on Cumberland Island; however, there is an existing road system that will be maintained by the NPS for its use and for the use of island residents (both retained rights holders and landowners and their guests). This road system consists of three types of roads described below and will be managed in accordance with one of the three alternatives set forth below. The road system will guarantee north to south and east to west transport for **non-commercial** legal right-holders and landowners and the NPS while minimizing the impact on the wilderness. NPS use of the road will be limited by the minimum requirement determination for its various management activities. The Retained Rights Affecting Wilderness section of the WMP lists which retained rights holders may operate vehicles on the various roads in the wilderness.

The NPS will define a road system to ensure reasonable, non-commercial, vehicular access and circulation for retained rights holders and landowners and to enhance wilderness character. The Cumberland Island Wilderness Act directs the Secretary to administer the wilderness in accordance with the relevant sections of the Wilderness Act and subject to valid existing rights. In keeping with the advice from the Senate, the NPS urges that all driving in the wilderness, whether exercised by retained rights holders, private landowners, or authorized NPS personnel, should be **special and limited**. Wilderness places an extra duty of care and responsibility upon all those who exercise stewardship on the island. According to the advice from the Senate, these pre-existing vehicular access uses should not be considered or allowed to become traditional or established as such term is used in the Wilderness Act.

The NPS will drive on these roads only after it determines that a vehicle is the minimum tool for carrying out an assigned task. The minimum requirement determination process will also prescribe the type of equipment needed to maintain the road system. The Okefenokee Rural Electric Cooperative may use vehicles on the road system to maintain its power lines only when these actions are the minimum tools to support the electric lines that serve retained rights holders and landowners. Motor vehicles are the minimum tools for routine maintenance and emergency repairs so that tools, equipment supplies, meters, and safety gear that are essential for work can be transported.

The NPS will divide the road system into several types of roads as determined by past and potential use. The roads with greater use will demand the highest amount of care and maintenance. In an effort to protect cultural resources, the NPS will not maintain as a road the portion of Table Point Road north of the Coleman Johnston retained right and the Terrapin Point Road. To restore the natural flow of water impeded by roads the NPS will replace culverts with bridges. Roads not identified as part of the road system will function and be maintained according to the standards developed for trails. The Stafford

Beach Road, located south of the wilderness, will serve as a mid-island east-west access and be maintained to the standard of a secondary road.

Alternative 1 (Preferred): The **primary ungraded road** category will include: (1) that section of the Main Road from the southernmost wilderness boundary to the junction of Plum Orchard Road; (2) Plum Orchard Road; (3) the section of the Main Road from the junction of the Plum Orchard Spur Road to its northernmost extent near the Cumberland Wharf; (4) Shell Road; (5) and North Cut Road. The NPS will maintain a 10-foot wide road with a one foot clearance on either side. Vegetation will be trimmed to a height of 14 feet. The section of the Main Road from the southernmost wilderness boundary to the junction of Plum Orchard Road would be in the **primary graded road** category until such time that full docking facilities are available at Plum Orchard.

The **secondary road** category includes the portion of Table Point Road from Duck House Road north (the NPS will not maintain as a road the portion of Table Point Road from the Main Road to Duck House Road), Cedar Dock Road, Whitney Road, South Cut Road, and Duck House Road. The NPS will maintain these roads to a 6-foot width. Vegetation will be trimmed to a height of 10 feet. The NPS will not grade these roads.

Maintenance of the road system will include the removal of damaged or dying trees that become hazards to the safe passage of authorized vehicles. Mechanical means may be used on the primary ungraded roads only to ensure safe passage for residents. The park will use non-mechanical means to treat hazardous trees on the remainder of roads. See Map 3, Road System, Alternative 1 (Preferred).

Alternative 2: The **primary graded road** category will include that section of the Main Road from the southernmost wilderness boundary to the junction of Plum Orchard Road and Plum Orchard Road itself. (The NPS already grades these sections of road on a regular basis.) The NPS will grade these roads no more than four times annually (or less depending upon a determination of conditions) to a 10-foot width with a 1 foot clearance on either side. Vegetation will be trimmed to a height of 14 feet. Some old oak limbs lower than 14 feet will be retained for their aesthetic appeal. The NPS may use mechanical and motorized devices, subject to the minimum requirement determination, to maintain these sections of road. This activity would continue on this schedule until such time that boats replace overland vehicles as the primary source of transportation. At that point in time road grading to Plum Orchard would be reduced proportionately to accommodate the number of overland vehicular trips.

The **primary ungraded road** category will include that section of the Main Road from the junction of the Plum Orchard Road to its northernmost extent near the Cumberland Wharf, Shell Road, and North Cut Road. The NPS will maintain a 10-foot wide road with a one foot clearance on either side. Vegetation will be trimmed to a height of 14 feet.

The **secondary road** category includes the portion of Table Point Road from Duck House Road north (the NPS will not maintain as a road the portion of Table Point Road

from the Main Road to Duck House Road), Cedar Dock Road, Whitney Road, South Cut Road, and Duck House Road. The NPS will maintain these roads to a 6-foot width. Vegetation will be trimmed to a height of 10 feet. The NPS will not grade these roads.

Maintenance of the road system will include the removal of damaged or dying trees that become hazards to the safe passage of authorized vehicles. Mechanical means may be used on the primary graded roads. The park will use non-mechanical means to treat hazardous trees on the remainder of roads. See Map 4, Road System, Alternative 2.

Use of Road System

The NPS proposes three alternatives for the use of the road system in keeping with the Senate's concern that private and NPS vehicular access are to be considered **special and limited** and not traditional or established. The NPS may temporarily close roads for safety concerns or if travel may cause significant impacts to resources (such as threatened and endangered species). Under all the alternatives, the NPS acknowledges the of the Camden County Court Judgment and Supplemental Decree recognizing the right to operate vehicles on the Main Road and the right of some retained rights holders to operate non-commercial vehicles on wilderness roads. The Greyfield Inn may operate motorized tours (i.e. commercial tours) for its overnight guests on the Main Road as defined by the Camden County Court Judgment and Supplemental Decree. The NPS will enforce the State of Georgia regulations on beach driving. (See the section on Beach Driving.)

Alternative 1 (Preferred): The NPS would request that everyone, including those with a legal right, **voluntarily** refrain from operating a vehicle on the portion of Duck House Road east of the Main Road, South Cut Road, Whitney Road, and Cedar Dock Road. Eliminating vehicles on these roads would provide the maximum protection to the wilderness and ensure that in a large portion of the wilderness visitors would not encounter mechanical or motorized vehicles. The NPS recognizes that those with a legal right to drive on these roads would experience some inconvenience and that traffic would be channeled on fewer roads. Under this alternative, retained rights holders and non-commercial landowners would operate vehicles on the other roads identified as part of the wilderness-road system. The NPS would monitor vehicular use of these voluntary-refrained roads and evaluate the effect on wilderness values.

Alternative 2: This alternative basically describes the situation as it now exists. Instead of the NPS distinguishing between the rights contained within the retained rights documents, the NPS would limit retained rights holders' driving to roads identified as part of the proposed road system, i.e. roads listed above as a primary graded, primary ungraded, and secondary. The NPS would ask island residents to limit their non-commercial driving to the same road system. Under this alternative, the NPS would have no way of identifying which retained rights holders or landowners have a specific right to operate vehicles on a particular road. Wilderness visitors would expect to encounter vehicles throughout the wilderness. At the very least, this alternative would define the use of a road system that could be posted for all on the island.

Alternative 3: The NPS would issue decals to retained rights holders and private landowners to place on their vehicles indicating on which roads they have a right to drive as specified in the Camden County Judgment and Supplemental Decree and the individual retained rights documents. Guests of retained rights holders and private landowners also would be obliged to obtain similar decals from the NPS. The NPS would expect that vehicles would be operated only on those roads indicated by the decals. Confining driving to those roads on which residents have a legal right would reduce the number of vehicles on certain roads in the wilderness. The chance of wilderness visitors encountering vehicles in some of the more remote portions of the wilderness would be reduced, potentially heightening the visitor experience.

Implementation of this alternative would entail the design, notification, and issuance of a decal system, followed by enforcement by NPS staff. Vehicles would be expected to drive on those roads indicated by the decals, and, it would be clear to the NPS, all residents, and park visitors which vehicles were operating within their legal rights as stipulated by retained rights agreements and the Camden County Court Judgment and Supplemental Decree. For the first time the NPS would be able to manage a road system and the operation of vehicles on the road system as outlined in legal mandates and documents.

Trail System

Visitors to the wilderness travel on trails, the Main Road, or the beach. Map 5 (Trail System-Alternative 2) illustrates the current trail system within CUIS. These main accessways allow visitors to travel through most of the wilderness. Little cross-country travel occurs because of the dense vegetation. To assist the wilderness traveler the NPS will establish a trail management program that will meet the following objectives:

- Enable hikers to travel on trails from the southern wilderness boundary to the northern portion of the wilderness;
- Separate hikers from vehicles to enhance visitors' wilderness experience;
- Enable hikers to travel between the maritime forest and the beach;
- Provide access to campsites;
- Provide visitors with a sense of remoteness and solitude while travelling on trails;
- Enable visitors to travel more easily through densely vegetated areas;
- Provide access to drinking water sources; and
- Be free of known hazards such as large obstructions (uncrossable downed trees and vegetation).

Definition of Trail System

The NPS may temporarily close trails for safety concerns or if travel may cause significant impacts to resources such as threatened and endangered species.

Alternative 1 (Preferred): The NPS would expand the trail system by extending the parallel trail to the southern boundary of the wilderness and then on to the Willow Pond Trail in the vicinity of the Hickory Hill camp area. The section of the trail from the southern wilderness boundary to the Willow Pond Trail would be known as the Serendipity Trail. Also, the Old River Trail from a trailhead across from the silos to White Branch Creek would become part of the trail system. The NPS would maintain Clubb Road as a trail that runs between the Main Road and High Point Road. Trails would be maintained according to the standards below.

The NPS also would modify the existing trail system by eliminating a number of trails. First, that portion of the Table Point Trail between the Table Point loop and the Kings Bottom Trail, the Ashley Pond Trail from the Kings Bottom Trail to the Main Road, and the Rayfield Trail from Kings Bottom to the Ashley Pond Trail would be deleted. Finally, the Kilman Field Trail (in the South Cut Road area) would be eliminated. All

other trails would be maintained according to the prescribed trail standards. See Map 6, Trail System-Alternative 1, and Appendix D for the existing trail system.

Alternative 2: The existing trail system would remain unchanged. It would be maintained according to the standards for trail maintenance described below. See Map 5, Trail System-Alternative 2, and Appendix D for the existing trail system.

Alternative 3: In addition to the existing trail system, the NPS would extend the parallel trail to the southern boundary of the wilderness and then on to the Willow Pond Trail in the vicinity of the Hickory Hill camp area. The section of the trail from the southern wilderness boundary to the Willow Pond Trail would be known as the Serendipity Trail. Also, the Old River Trail from a trailhead across from the silos to White Branch Creek would become part of the trail system. In the event that the NPS establishes a camp area accessible to hikers and kayakers near Christmas Creek, it would designate an access trail from the camp area to the beach. The NPS would maintain as a trail Clubb Road, which runs between the Main Road and High Point Road. Trails would be maintained according to the standards below. See Map 7, Trail System-Alternative 3.

Alternative 4: The NPS would modify the existing trail system by eliminating a number of trails. First, the Tar Kiln Trail (Yankee Paradise camp area) and the Oyster Pond Trail (including a portion of the Lost Trail that connects to the Main Road) would no longer be maintained. Second, that portion of the Table Point Trail between the Table Point loop and the Kings Bottom Trail, the Ashley Pond Trail from the Kings Bottom Trail to the Main Road, and the Rayfield Trail from Kings Bottom to the Ashley Pond Trail would be deleted. Finally, the Kilman Field Trail (in the South Cut Road area) would be eliminated. Otherwise, all other trails would be maintained according to the prescribed trail standards. See Map 8, Trail System-Alternative 4.

Trail Maintenance Standards

The NPS will maintain trails within the Cumberland Island Wilderness to a width of 4 feet, with an 8-foot height clearance. Professional judgment based upon a minimum requirement determination will determine situations where the width and height clearance might be narrower and lower. Limbs fewer than 6 inches in diameter within the 8-foot height clearance will be trimmed. In most instances, downed trees laying across the trail that may be stepped over by a hiker will remain.

Trail water crossings (foot bridges) in need of substantial repair will be replaced only if they are essential for resource preservation or where significant safety hazards exist during the normal period of use. Necessary replacement structures will be of a standardized rustic design having a maximum 24-inch width.

Where possible, all cut material (limbs, brush) will be placed out of sight of the trail corridor either behind standing vegetation or away from the trail. Vegetation along trail edges will be trimmed to appear as natural as possible.

Access between inland trails and the beach will be provided at designated dune crossings. No dune boardwalks will be constructed in the wilderness unless determined to be necessary for resource protection. Because of storm blowdowns, excessive wear to the trail path tread, and the human effects on flora or fauna, a trail may require occasional relocation or rerouting.

Trail maintenance will be conducted with hand tools only. Pruning saws, axes, loppers, machetes, and cross cut saws are the primary tools used for trail maintenance.

Wilderness Camp Areas

The GMP designates four “primitive” campgrounds in the mid- to northern portion of the island (the wilderness). Use would not exceed 80 persons at any one time. In addition, Stafford, which is situated in a more developed setting, would offer a “semi-primitive” camping experience to a maximum of 20 persons.

Overnight visitors camping in the wilderness presently stay at three camp areas: Hickory Hill, Yankee Paradise and Brickhill. (See Map 3, Trail System-Alternative 1, for locations of existing and proposed camp areas.) Distances from the Sea Camp dock to the camp areas are 6.1 miles to Hickory Hill, 7.2 miles to Yankee Paradise and 10.8 miles to Brickhill. Campers stay within 50 yards of a camp area post. Well water is available in the wilderness south of Yankee Paradise and at Brickhill. In addition hikers may obtain water at Stafford Beach campground located just south of the wilderness boundary and Plum Orchard outside of wilderness. The Stafford Beach campground is not classified as a wilderness camp area. A maximum total of 60 campers per night may stay at the three wilderness camp areas and at Stafford Beach campground. Usually the 20 spaces at the Stafford Beach campground fill up leaving 40 spaces for the three wilderness camp areas. Because the NPS had not developed a WMP until this time, it has

not implemented the GMP's proposal to allow 100 overnight campers in the wilderness (80) and at Stafford (20).

After the establishment of the trail system the NPS may need to move the specific location of some camp areas to avoid conflicts with private property, retained rights holders, and cultural resources. To protect wilderness resources and enhance the overnight visitor's experience in wilderness the NPS has established the following objectives:

- Enable hikers to stay overnight in a variety of island settings and locations throughout the wilderness;
- Minimize impacts of overnight visitors on wilderness resources;
- Provide opportunities for visitors to camp with a sense of remoteness and solitude;
- Separate campers from roads and island residences to enhance visitors' wilderness experience and protect residents' privacy;
- Enable kayakers/canoers to have reasonable access to camp areas;
- Provide campers with opportunities to obtain drinking water from existing sources within the wilderness; and
- Provide opportunities for challenge and primitive recreation.

The NPS requires that a permit be obtained for camping (see the Wilderness Use Permits and Reservation section of the WMP). Camping will be limited to designated camp areas. To confine impacts, camping will occur within 50 yards of a camp area post. If impacts exceed acceptable levels (i.e., negative impacts to the environment), management actions will be taken to reduce impacts. This may include the designation and delineation of individual campsites within the general camp area. All alternatives propose a situation wherein the number of overnight campers in the wilderness increases and more closely approximates the number recommended in the GMP (which is 80) than available currently (which is 40). Acceptable levels of change for camping-related impacts will be established during development of the camp area-monitoring program, based on studies recommended through the RMP. Because vehicles along Duck House Road travel close to the Yankee Paradise camp area and may disturb wilderness campers, the NPS will move the camp area to a location within close proximity to the water source.

Alternative 1 (Preferred): Camping would continue at the Hickory Hill and Yankee Paradise locations. The Brickhill camp area would be moved away from the cultural resource area. In addition, the NPS would establish two additional camp areas. Sweetwater would be located south of South Cut Trail along the Roller Coaster Trail. Christmas Creek would be located adjacent to Long Point Road south of Cedar Dock. Campers staying at these sites would bring drinking water from other areas. A maximum of 15 people each would stay overnight at Hickory Hill and Yankee Paradise. Brickhill, Sweetwater and Christmas Creek would each hold a maximum of 10 people. A maximum total of 60 campers per night would be allowed in the wilderness.

Alternative 2: Camping would continue at the Hickory Hill and Yankee Paradise locations. The Brickhill camp area would be moved away from the cultural resource

area. The NPS would allow a maximum of 20 campers at each camp area. A maximum total of 60 campers per night would be allowed in the wilderness.

Alternative 3: This alternative reflects the recommendation of the GMP. The NPS would provide camping at four areas in the wilderness allowing a maximum of 20 campers at each area. Camp areas would include Hickory Hill, Yankee Paradise, Brickhill (the current or a new location), Sweetwater, and Christmas Creek. A maximum of 80 campers per night would be allowed in the wilderness. The areas would be rotated periodically.

Alternative 4: No action alternative would be taken. The NPS would allow wilderness camping at three areas: Hickory Hill, Yankee Paradise, and Brickhill. A maximum of 40 campers per night would be allowed in the wilderness.

TABLE 3

Wilderness Camp Areas

	Hickory Hill (maximum # campers per night)	Yankee Paradise (maximum # campers per night)	Brickhill Bluff (maximum # campers per night)	Sweet-water (maximum # campers per night)	Christmas Creek (maximum # campers per night)	Total campers per night
Alternative 1	X (15)	X (15)	X (10) move away from cultural resources	X (10)	X(10)	60
Alternative 2	X (20)	X (20)	X (20) move away from cultural resources			60
Alternative 3	X (20)	X (20)	X(20) move away from cultural resources	X(20)	X(20)	80 (NPS selects from 4 of possible 5 areas)
Alternative 4	X (20)	X (20)	X (20)			40 (may be spread among the 3 camp areas; no one area may exceed 20 per night)

Human Waste Management

Wilderness Visitors: Improper management of human waste can affect the environment and the visitor's wilderness experience. Aesthetic and public health impacts result if toilet paper and fecal matter are left in sight of trails or campsites. Contamination of water sources is

also likely. Animals may be attracted to the salts in urine and may dig out buried toilet paper.

The wilderness area of Cumberland Island is relatively small, and the number of visitors is controlled. Camping is limited to designated sites and use of these sites varies with the season. At this time, catholes are adequate for protection of the resource and the visitor experience and have the least impact on the primitive aspect of the wilderness. If toilet paper blooms or impacts on shell middens or other resources are unacceptable, camp area use may be reduced or an alternative human waste system developed.

Information about impacts on archeological resources, the permeability of the soils, the time frame involved in waste and pathogen breakdown in the island's soil and climate, effects on the water table, and similar factors need to be considered for determining the feasibility of any waste management effort. Development of any alternative human waste system (such as pit privy or solar composter) would follow the minimum requirement process.

Visitors to Cultural Resources at North End of the Wilderness: The NPS will transport a number of park visitors to the north end of the island to view the cultural resources associated with Half Moon Bluff. In all likelihood, these people will arrive by boat. In that their primary objective will be to visit these significant cultural resources and not enjoy a wilderness experience, for health reasons the park will need to provide some type of rest room facility. These park visitors will not be expected to follow the same rules for human waste management as wilderness visitors.

Alternative 1 (Preferred): The NPS would require rest room facilities on the boat transporting visitors to the north end of the island and at the Settlement.

Alternative 2: The NPS would require rest room facilities on the boat transporting visitors to the north end of the island.

Alternative 3: The NPS would provide a rest room facility near (but no closer than 75 feet from the water) the north end boat access area.

Signs

Signs detract from the wilderness character and make the imprint of man and management more noticeable. Only those signs necessary to protect wilderness visitors or resources, such as those identifying routes, indicating private or retained rights property, or signifying endangered species nests or habitat, will be permitted. All signs will be of the smallest size and of the minimum number to accomplish the objective. Signs will be rustic in appearance. Proposed signs and signs currently in place will be fully evaluated to determine their need, number, and location. Every effort will be made to ensure that signs blend with the natural environment to the maximum extent possible. Routed, unpainted, rough-cut wood signs are the standard. A few brown carsonite stakes with regulation enforcement brown, white, and red signs will be used in specific situations, including at trailheads and boat landing areas.

Within the Cumberland Island Wilderness occasional signs will be necessary to regulate visitor activity in certain areas for visitor or resource protection. Some existing signs designate the trails throughout the wilderness. Occasionally signs are needed to remind island visitors that bicycles are not allowed on trails or, in some cases, on roads. The number of signs used in the wilderness will be kept to an absolute minimum.

Signs indicating the type of travel allowed or prohibited (such as bicycles) will be located outside the entrance to the wilderness along the Main Road near Stafford. The NPS will erect similar signs at Plum Orchard. These signs will be directed toward visitors who park their private boats at the Plum Orchard dock. It may also be necessary to place a sign near the water-access entrances at the Brickhill and proposed Christmas Creek camp areas. The NPS will also place signs indicating the name of the trail at trail intersections and the intersection of trails and roads. These signs will help visitors orient themselves in an environment with little topography, dense vegetation, and few views. The park will also place two-sided signs along the Main Road where it crosses from park to private property and reserved estates.

Other Management Facilities

The Wilderness Act defines wilderness as “undeveloped Federal land retaining its primeval character and influence without permanent improvements.” Accordingly, *Director’s Order #41* authorizes management facilities located in the wilderness to be limited to the types and minimum number essential to meet the minimum requirement for the administration of the wilderness area. Preserving the wilderness character and values will drive the decision to construct, maintain, or remove an administrative facility.

Management facilities may be allowed in the wilderness only if they are determined to be the minimum requirement necessary to carry out wilderness management objectives. Such facilities not needed to carry out wilderness management objectives will be razed and removed. No more wells will be drilled. Weather stations will be located outside of the wilderness only. The NPS may preserve the Alberty House to use as a visitor contact area for the Settlement and as an overnight shelter for NPS staff, interns, volunteers or researchers working in the wilderness. Temporary facilities such as tents and the North Cabin may be used as needed to meet program objectives. The North Cabin will be removed when the Alberty House is restored as described above.

The CRMP makes determinations regarding the historic significance and disposition of the structures contained within reserved estates. The recommended treatments comply with cultural resource protection and preservation policies and directives and with the concept of minimum requirement determination for wilderness.

Several properties at Cumberland Island held within reserved estates allow holders of the estates certain retained rights to undertake prescribed activities both within and outside the boundaries of their property. Many of the resources discussed in this plan are within reserved estates and are therefore not within direct NPS jurisdiction; however, specific resource treatment recommendations are provided for those resources because they will

transfer to direct NPS stewardship upon the expiration of the reserved estate. Accordingly, the NPS acknowledges its responsibility to work closely with holders of reserved estates to ensure that the treatment recommendations for reserved estate resources outlined in the CRMP are supported.

The NPS may choose to undertake preservation work on historic resources located on reserved estate properties only when those resources are considered exceptionally significant, are not in active use by the estate holder, and require a high level of cultural resources management knowledge and skill. If the reserved estate holder is using and benefiting from the structure, federal funds should not be expended to maintain the structure. Examples of reserved estate structures that currently meet the criteria for NPS intervention include the Stafford Chimneys and Stafford Tabby House. These structures and others that meet the criteria are discussed in greater detail at various points in the CRMP.

Section 704(c) of the Telecommunication Act of 1996 (Public Law 104-104) requires the President or his/her designee to develop new procedures for agencies to make Federal lands available for the siting of new telecommunications services. The Federal Communications Commission procedures require the preparation of an environmental assessment by the applicant and may require further environmental processing if:

- The facilities are proposed to be located in an officially designated wilderness area;
- The facilities are proposed to be located in an officially designated wildlife preserve;
- The facilities may affect listed threatened or endangered species or designated critical habitat; or
- The facilities may affect districts, sites, buildings, structures, or objects, significant in American history, architecture, archeology, engineering, or culture that are listed, or are eligible for listing, in the National Register of Historic Places .

In accordance with the Wilderness Act, facilities such as fire lookouts, radio and/or cellular telephone antennas, radio repeater sites, and other telecommunication facilities may be allowed in the wilderness **only** if they constitute the minimum facility required to carry out essential administrative functions for the purpose of the wilderness and are specifically authorized with supporting environmental compliance documentation. No derogation of the values and purposes for which the wilderness was established may occur. Any telecommunication facility proposed for placement must first consider all potential locations outside wilderness and all other means to provide the service. NPS policy does not allow for piggybacking on existing rights-of-way.

Further, NPS policy does not allow the presence of towers or rights-of-way in the wilderness; however, because of the existence of retained rights, CUIS may be an exception to the NPS policy. Four retained rights holders possess the right to future utilities.

Visitor Use Activities and Levels

Desired Future Conditions for the Cumberland Island Wilderness Visitor Experience

The Wilderness Act defines wilderness as an area with "outstanding opportunities for solitude or a primitive and unconfined type of recreation." One of CUIS' primary wilderness management objectives is to provide and protect for present and future visitors the special qualities offered in wilderness. These include solitude, remoteness, risk, challenge, self-sufficiency, discovery, and the opportunity to observe a naturally functioning ecosystem. The NPS has established the following specific goals concerning visitor experiences within the Cumberland Island Wilderness:

- Provide unconfined recreational opportunities;
- Provide opportunities for remoteness and solitude;
- Minimize interactions between visitors and vehicles;
- Provide opportunities for visitors to enjoy the variety of resources found in the wilderness (the beach, marshes, maritime forest, and examples of past human use);
- Provide opportunities for a primitive recreation experience; and
- Limit commercial operations to only those legally acceptable in a wilderness setting.

The park staff will subsequently use these goals as standards to assess, monitor, and evaluate the effectiveness of the wilderness management program.

Party Size

To ensure that visitors' wilderness experience is protected, standards and guidelines for party size have been established. Visitors should have the opportunity to immerse themselves in the natural world, separated from the trappings of modern civilization, including non-natural sights and sounds. The size of parties travelling within the wilderness (group sizes) can have significant effects on wilderness resources and the quality of visitors' experiences.

The number of visitors staying at camp areas is defined in the Overnight Access section of this plan. Parties assembling at the Settlement for community gatherings are addressed in the Organized Groups section of this plan.

Alternative 1 (Preferred): A review of party size camping in the wilderness over the last 7 years revealed that, most frequently, groups up to 15 have stayed at a camp area. Upon the basis of this review, maximum party size for overnight and day users will be 15 visitors. Parties larger than 15 must break into separate groups, travelling 0.25 mile apart.

Alternative 2: This alternative reflects the NPS's present policy of not restricting the number of visitors travelling in the wilderness together. Occasionally school groups and

other organized parties will bring parties larger than 20 to the seashore and travel together.

Alternative 3: The above-mentioned review revealed that, infrequently, groups up to 20 have stayed at a camp area. As a result of this information, the NPS would establish the maximum party size for overnight and day users at 20 visitors. Parties larger than 20 must break into separate groups, travelling 0.25 mile apart.

Day Use

Recent visitor use surveys indicate that the majority of day use visitors to the national seashore seldom enter the wilderness. Because most day users arrive on the island by ferry at the Sea Camp or Dungeness docks (located on the south end of the island), few visitors hike to the wilderness and return to the mainland in one day. As a result of their limited contact with the wilderness, day-users have little impact on wilderness resources.

Presently, wilderness users include campers day-hiking from Sea Camp and Stafford Beach (located south of the wilderness); visitors camping at Hickory Hill, Yankee Paradise, and Brickhill (all located in the wilderness); and visitors arriving by private boat. Those who arrive by private boat usually land at Plum Orchard or Brickhill; some stay for the day, while others stay overnight, some with a permit or illegally without a permit. A small number of boaters travel up the tidal creeks that penetrate the wilderness. Hikers in the wilderness usually travel on the Main Road or the trail network, and many hike on the beach. The overall impact of these visitors to the wilderness is minimal.

Landowners, reserved rights holders, and their guests also travel in the wilderness mostly by vehicle but sometimes hiking. Their numbers vary from season to season and their presence is most evident on the Main Road and on the beach. Several retained rights holders, their caretakers, and the owners and staff of the Greyfield Inn may be considered full-time residents of the island. Some live in wilderness and others in potential wilderness. At present, the Greyfield Inn transports its guests by vehicle through the wilderness on a regular basis. On a less frequent basis, Cabin Bluff transports its guests by vehicle through the wilderness.

Day use will continue within the Cumberland Island Wilderness and will be monitored to determine the number of wilderness visitors, the types of activities occurring, and any adverse affect on the resources. The NPS may expect an increase in wilderness day use with scheduled tours to Plum Orchard and the Settlement for the purpose of cultural resource interpretation. While the NPS provides ground transportation to these destinations, visitor interaction with the wilderness will be limited. The visitor experience will be confined to travelling through the wilderness in a vehicle on the Main Road (and the connecting road to the Settlement) and perhaps wandering in the wilderness for a short period before the vehicle returns to the Dungeness dock area. Some Sea Camp visitors may elect to participate in these tours and walk back to their campsites.

The 1984 GMP recognized that transportation would be needed to carry visitors between Sea Camp dock and the Plum Orchard Mansion. Because interpretive tours would be kept to small groups, it allowed for a motorized vehicle with a capacity of 12 persons. Concurrently, the GMP (reflecting the direction of Congress) recommended that the NPS examine the feasibility of water transportation between Sea Camp and Plum Orchard. Although Congress excluded Plum Orchard Mansion and surrounding grounds from designation as wilderness or potential wilderness, it designated that portion of the Main Road from the mansion to the southernmost wilderness boundary as a potential wilderness addition. The road will change to wilderness classification at such time that all retained rights for its use expire. The GMP recommended that if cost-effective boat access could not be provided, the use of motorized or non-motorized vehicles for visitor access to Plum Orchard would continue as long as the Main Road remains as potential wilderness.

In keeping with the GMP, access by ferry to Plum Orchard is routinely provided the first Sunday of every month. Additionally vehicular access to Plum Orchard Mansion via the Main Road and Plum Orchard Spur Road will be available within the limits of the concept of “no net increase in impact.” To meet these obligations the NPS will drive vehicles between the southern boundary of the wilderness and the Plum Orchard Historic District.

Based upon a minimum requirement determination, the WMP recommends providing motorized van service for 14 visitors to Plum Orchard. This service coincides with NPS personnel travelling to Plum Orchard thrice weekly. Thus the staff person will drive the vehicle to the site carrying a maximum of 14 visitors.

The concession-operated ferry will continue to bring larger numbers (up to 146) of visitors to Plum Orchard Mansion once per month. The NPS will conduct a study to determine the feasibility of providing regular trips to Plum Orchard to replace the reliance on the van.

The 1984 GMP did not specifically address transportation to the Settlement. It directed the NPS not to develop a public dock at the old Cumberland Wharf site to ensure that the High Point/Half Moon Bluff Historic District would not become an ancillary landing site or a high use area.

To provide access for visitors to the historic resources located on the north end of the island the NPS will evaluate the feasibility of building, operating, and maintaining a dock at one of the available dock sites on the north end, including the old Cumberland Wharf. The NPS will consider using the same boat to provide access to the Plum Orchard Historic District. In accordance with the recommendations of the RMP concerning the development of low-impact electric powered vehicles, the NPS will make available electric vehicles to transport people with special ambulatory needs from the docking site to the Settlement. Visitors without special ambulatory requirements will walk from the docking area to the Settlement.

Until boat transportation is available, the NPS will provide limited, regular, and publicly announced visitor access by NPS vehicle to the north end based on the “no net increase in impact” concept. This service is provided once per month as a result of a minimum requirement determination.

Waterways such as the Cumberland and Brickhill Rivers and other tidal creeks are outside the wilderness and thus open to motorized use.

Overnight Access to the Wilderness

The 1984 GMP for CUIS states that backpackers will enter the wilderness near Stafford. Generally this means that they will access the wilderness at the southern boundary along the Main Road, from the beach, or on a trail. Since the completion of the GMP kayakers/canoers and other boaters have been entering the wilderness at various points along the western shoreline. The GMP did not anticipate water access to the wilderness.

The NPS has developed three alternatives designating overnight access points into the wilderness:

Alternative 1 (Preferred): This alternative, reflecting the current condition, would limit backpacker access to that stated in the GMP would allow for backpackers to enter the wilderness from the south along the Main Road, trails, or along the beach. Although the GMP did not anticipate water access to the wilderness, the NPS would designate specific entry points for kayakers/canoers. No motorized landings by boats would be allowed in the wilderness, however boaters would come ashore by non-motorized means. Access to the wilderness by the NPS (or concession) van or boat tours to Plum Orchard and the north end access near the Settlement would be limited to day use.

Alternative 2: Backpackers would enter the wilderness from the southern boundary. Access to the wilderness for overnight use would also be permitted via the NPS (or concession) tours to Plum Orchard and the north end access point. Because the trips to Plum Orchard and the Settlement are designed for day use, the NPS would limit the number of overnight campers on these trips. The NPS would designate specific entry points for kayakers/canoers to gain access to the wilderness. No motorized landings by boats would be allowed in the wilderness, however boaters would come ashore by non-motorized means.

Alternative 3: Backpackers would enter the wilderness from the southern boundary. Access to the wilderness via the NPS (or concession) van or boat tours to Plum Orchard and the north end access point would be limited to day use. Overnight access to the wilderness by watercraft would be limited to kayakers/canoers; the NPS would designate specific entry points. Motorized access for overnight wilderness trips would not be allowed.

TABLE 4
Overnight Access to the Wilderness

	Hikers enter from south	Specific entry points for kayaks/canoes	No motorized landings-kayaks/canoes only	No motorized landings/non-motorized access	Plum Orchard/ North end tours-day use only	Plum Orchard/ North end tours-overnight access allowed
Alternative 1	X	X		X	X	
Alternative 2	X	X		X		X
Alternative 3	X	X	X		X	

Wilderness Use Permits and Reservations

Wilderness use permits are required for all overnight camping and must be obtained prior to wilderness entry. Numbers of overnight visitors are limited at each of the camp areas. Reservations will be taken for camp area space up to 6 months in advance. Those spaces not reserved in advance will be assigned on a first come first served basis to visitors checking in at the St. Marys Visitor Center.

Beach Driving

The State-owned beach area at CUIS that has been designated “potential wilderness” is not yet a wilderness area; therefore it is not subject to the Wilderness Act prohibitions on vehicles. Thus, the NPS cannot regulate driving on the beach in the potential wilderness area any more strictly than on any other part of the national seashore. The NPS can prohibit drivers from accessing the beach through the designated wilderness area subject to the rights described in the reserved estates.

The State-owned beach area, although within the boundaries of the national seashore and thus under NPS jurisdiction, is not subject to NPS regulations governing vehicles (36 C.F.R. 5.6) and commercial vehicles (36 C.F.R. Part 4). The NPS, however, may assimilate applicable State of Georgia criminal statutes into Federal law through the Assimilative Crimes Act (18 U.S.C. 13) and enforce them in areas over which the NPS has jurisdiction. Georgia’s Shore Protection Act is one such statute. Under this act, the State of Georgia has adopted rules to authorize the operation of motor vehicles on Georgia’s dynamic dune field and beaches (beach driving). The rules apply to Cumberland Island and other beaches in the State and went into affect on May 1, 1999.

The State may issue authorizations to the following classes of individuals to operate motor vehicles on, over, or across the dynamic dune field or beaches:

- Those engaged in bona fide educational activities or scientific research that require beach driving;
- Legal residents or full-time residents on the particular island for which the authorization is requested;
- Those involved in beach maintenance or security that makes driving a vehicle necessary; and
- Those owning or having an interest in real property on the island in question, or the spouses, parents, children, grandchildren, and other lineal descendants (and their spouses) of such individuals.

Additional rules:

- Authorizations are non-transferable
- Vehicle access to the beach only over State-approved designated routes from the upland
- Authorizations issued to individuals only, except for those who qualify under general authorizations
- Only those with a valid driver's license may drive
- Beach driving between May 1 and October 31 restricted to daylight hours for protection of endangered nesting sea turtles, except for scientific research, predator control, educational activities, or law enforcement
- Driving limited to the wet sand beach
- Drivers to minimize disturbance to shorebirds, turtles, or other wildlife and to avoid disturbance altogether if possible
- Speed limit of 25 mph from August 1 through March 31 and 20 mph from April 1 through July 31, except in case of an emergency
- Authorization to drive on the beach not required during a medical emergency.

Under concurrent jurisdiction, the NPS will enforce the State of Georgia's beach driving rules. Park staff engaged in resource monitoring and law enforcement responsibilities as determined by the minimum requirement process will be allowed to operate a vehicle on the beach for those activities only.

Stock Use

Horseback riding is recognized as a legitimate recreational use in the Cumberland Island Wilderness. Several retained rights holders keep horses in enclosures and ride them or use them to pull buggies. Stock is permitted only on the established road system and the ocean beach. No overnight camping with stock is permitted. "Leave No Trace" principles for minimizing stock impacts will be encouraged. Stock may be temporarily tied (with tree protection) to trees greater than 6 inches in diameter. Grazing is not

permitted within the wilderness, and imported feed must be certified weed-free to reduce introduction of exotic plants.

Bicycles

The Wilderness Act states that “subject to existing private rights, there shall be no...other form of mechanical transport...within any such area.” The *Code of Federal Regulations* (36CFR4.30) further states that possessing a bicycle in a wilderness area established by Federal statute is prohibited. The NPS defines mechanical transport as “any contrivance for moving people or material in or over land, water, snow or air that has moving parts and is powered by a living or non-living power source. This includes (but is not limited to) wheeled vehicles such as bicycles, game carriers, carts and wagons.”

Except for those with retained rights or those subject to the 1964 and 1965 Camden County Court Judgment and Supplemental Decree, the NPS will not allow the operation of bicycles in the wilderness. According to the authorities contained in the 1972 CUIS establishing legislation and the 1982 CUIS Wilderness Act, the NPS believes that the operation of vehicles (including bicycles) extends to non-commercial residential purposes. Those with rights to operate a vehicle may ride bicycles on the beach and road system defined by the WMP. The NPS will not allow bicycles on trails.

Wilderness Use by Persons with Disabilities

The Americans with Disabilities Act of 1990 (ADA) states that “nothing in the Wilderness Act is to be construed as prohibiting the use of a wheelchair in a wilderness area by an individual whose disability requires the use of a wheelchair, and consistent with the Wilderness Act, no agency is required to provide any form of special treatment or accommodation, or to construct any facilities or modify any conditions of lands within a wilderness area to facilitate such use.”

Opportunities to enjoy wild lands within CUIS are available to people in varying degrees. By its very nature, wilderness is not readily accessible to all people and offers some visitors greater challenge and risk than others. The NPS has the legal obligation to make available equal opportunities for people with disabilities in all of its programs and activities. This requirement includes the opportunity to participate in wilderness experiences. The decision to provide for wilderness use by persons with disabilities should balance the intent of the access and wilderness laws and find a way to provide the highest level of access and reasonable accommodations for the disabled with the lowest level of impact on the wilderness resource.

Cumberland Island National Seashore will seek ways to provide opportunities for physically disabled individuals to enjoy wilderness while preserving wilderness resources and character. This applies to individual for whom wheelchairs must be the normal means of conveyance, not to those with temporary injuries or who use a wheelchair for occasional conveyance.

Mobility-impaired persons may use wheelchairs to gain access to the wilderness. Motorized wheelchairs (that is, a self-propelled wheeled device, designed solely for and used by a mobility-impaired person for locomotion, capable of and suitable for use in indoor pedestrian areas) are permitted; however, motorized all-terrain wheelchairs (ATWs) are not.

Because of the relatively flat terrain and the fact that all visitors to the wilderness must first travel on roads and trails similar to those in the wilderness to gain access to the wilderness, the construction of barrier-free trails is not necessary. Standards for trail maintenance will ensure that some trails in the wilderness will be accessible to the physically disabled. The flat terrain and trails make the wilderness trail and road system one of the most accessible for those in wheelchairs of any wilderness.

A service animal is a guide dog, signal dog, or other animal individually trained to provide assistance to a person with disabilities. Persons with disabilities that require service animals will be permitted in the wilderness. The animals are to be leashed at all times.

The NPS will research and provide information to assist disabled travelers in accessing the wilderness. The information might include adaptive equipment, techniques, listings of commercial outfitters, and a map of accessible trails.

Recreational Hunting

Section 5 of Public Law 92-536 states, “the Secretary shall permit hunting...on lands and waters under his jurisdiction within the boundaries of the seashore in accordance with the appropriate laws of Georgia and the United States to the extent applicable, except that he may designate zones and establish periods when no hunting...shall be permitted for reasons of public safety, administration, fish and wildlife management, or public use and enjoyment.”

The NPS cooperates with the State of Georgia Department of Natural Resources to permit managed hunts annually in the wilderness. Hunters participate in a variety of activities including bow and arrow, primitive weapon, pistol, hog hunting with modern weapons, and parent-child. Presently, the NPS encourages hunters to take hogs during all hunts. The NPS limits deer hunting to some of the hunts.

The park will determine the number and nature of hunts on an annual basis: (1) to manage the native species (deer); (2) to assist in the removal of non-native species; (3) to control the number of hunters; and (4) to define the type of hunter. In coordination with the State of Georgia, the NPS will attempt to eliminate the hog population on the island. Details of this program will be described in a hog management plan.

The NPS proposes three alternatives for hunting:

Alternative 1 (Preferred): Hunters would gain access to the wilderness on foot from the Plum Orchard dock. For an initial five-year period hunters would stay at a hunt camp (or at a location outside the wilderness) or at designated wilderness camp areas. They would be responsible for transporting their game to the hunt camp with wheeled handcarts. There, the NPS would provide refrigerated facilities for the carcasses until transport off the island.

After five years the NPS would require hunters to transport their game to the Plum Orchard dock without the benefit of a wheeled vehicle. Hunters would be subject to the same wilderness rules as other visitors and would stay at designated wilderness camp areas. The number of hunters staying at the designated camp areas in the wilderness would not exceed the numbers prescribed for overnight use in the Wilderness Camp Areas section of the WMP.

For the five-year period, NPS rangers would drive on the established road system and beach to provide law enforcement and ensure hunter safety. After each hunt NPS personnel would transport trash in official vehicles to the dump facility in the Dungeness area at the southern end of the island. Following this five-year period, park rangers would patrol the wilderness on foot during the hunting season and camp in the wilderness or at a NPS structure at the north end of the island. Rangers would gain access to the wilderness via boat to Plum Orchard or the north end of the island.

Alternative 2: This alternative substantially reflects the present recreational hunting situation with several modifications to protect cultural resources. Hunters would continue to hunt out of two locations: Plum Orchard and Brickhill Bluff. The hunt camp south of Plum Orchard would serve as the primary deer hunting camp until the NPS finds a new location outside the wilderness. For safety considerations and to spread the hunters throughout the wilderness, some hunters would gain access to the wilderness by motorboat at Brickhill Bluff. The NPS would designate specific access and camping areas at the Bluff to avoid adverse impacts to the shoreline and fragile cultural resources.

During managed hunts NPS rangers would drive on the established road system and beach to provide law enforcement, ensure hunter safety, and pick up game and carry the carcasses back to the cooler at the hunt camp. After each hunt NPS personnel would transport trash in official vehicles to the dump facility in the Dungeness area at the southern end of the island.

Alternative 3: Hunters would gain access to the wilderness from two points: Plum Orchard and Brickhill Bluff. The camp at Plum Orchard would serve as the primary deer hunting camp until the NPS finds a new location outside the wilderness. For safety considerations and to spread the hunters throughout the wilderness, some hunters would gain access to the wilderness by boat at Brickhill Bluff. The NPS would designate specific access and camping areas at the Bluff to avoid adverse impacts to the shoreline and fragile cultural resources. Hunters would be required to use handcarts to transport their game to the coolers at the hunt camp. NPS personnel would not provide this service. The number of hunters staying at the designated camp areas in the wilderness

would not exceed the numbers prescribed for overnight use in the Wilderness Camp Areas section of the WMP.

During managed hunts NPS rangers would drive on the established road system and beach to provide law enforcement and ensure hunter safety. After each hunt NPS personnel would transport trash in official vehicles to the dump facility in the Dungeness area at the southern end of the island.

Under all alternatives hunters may use portable tree stands that must be dismantled upon their leaving the wilderness. Tree stands may stay in place overnight. Hunters will not be allowed to cut vegetation and must remove flagging.

The NPS will issue hunt permits to retained rights holders with a specific retained right to hunt and to their guests. These retained rights holders and their guests may use vehicles in accordance with the road system. They may not hunt from vehicles.

TABLE 5
Recreational Hunting

	Access by Boat to	Camp at	Hunters Transport Game	NPS Rangers	Trash	Retained Rights Holders, Landowners, Guests
Alternative 1 (Preferred)	Plum Orchard	New Hunt Camp (for first 5 years) then Wilderness Camp Areas only	Handcart After 5 years, hunters haul (no carts)	Drive for law enforcement and hunter safety After 5 years, patrol on foot	NPS vehicle haul to Dungeness	Obtain hunt permit Drive according to rights
Alternative 2	Plum Orchard	Hunt Camp Wilderness Camp Areas	NPS vehicle picks up	Drive for law enforcement and hunter safety	NPS vehicle haul to Dungeness	Obtain hunt permit Drive according to rights
Alternative 3	Plum Orchard Brickhill Bluff	Hunt Camp Wilderness Camp Areas	Handcart	Drive for law enforcement and hunter safety	NPS vehicle haul to Dungeness	Obtain hunt permit Drive according to rights

Trapping

Section 5 of Public Law 92-536 states, “the Secretary shall permit...trapping on lands and waters under his jurisdiction within the boundaries of the seashore in accordance with the appropriate laws of Georgia and the United States to the extent applicable, except that he may designate zones and establish periods when no...trapping shall be permitted for reasons of public safety, administration, fish and wildlife management, or public use and enjoyment.” The *Code of Federal Regulations* (36CFR2.2)(b)(3) states that trapping shall be allowed in the park areas where such activity is specifically mandated by Federal statutory law.

The NPS will allow trapping on CUIS in accordance with 36CFR2.2 and the State of Georgia Trapping Regulations. In the wilderness, with the exception of those who have a specific right to operate vehicles for non-commercial purposes on the Road System, visitors (trappers) must walk and haul their take out without the assistance of wheeled vehicles. The NPS may establish specific regulations, times, and areas where trapping may occur.

Commercial Services

The Omnibus Park Management Act of 1998 (Public Law 105-391) governs commercial services in National Park System units. The NPS Concessions Management Improvement Act of 1998 is the short title for Title IV of the Omnibus Act that deals directly with NPS concessions. This legislation supercedes the Concessions Policy Act that has guided NPS management of concessions for the last 30 years. The new legislation incorporates much of the philosophy of the old law, including limiting development “...to those accommodations, facilities, and services that are necessary and appropriate for public use and enjoyment of the unit of the National Park System in which they are located and are consistent to the highest practicable degree with the preservation and conservation of the resources and values of the unit.” Only economically feasible concession operations should be introduced.

A concessioner has been instrumental in ferrying visitors to CUIS for over 20 years. For several years the concession-operated ferry has also transported visitors to Plum Orchard the first Sunday of each month. Currently no concession-operated service brings visitors directly into the wilderness. (The park’s Draft Commercial Services Plan discusses commercial operations within and outside the wilderness in detail.)

Within the past several years, commercially led kayak tours have begun to provide access to the wilderness. The NPS issues Incidental Business Permits to qualifying outfitters who wish to lead these expeditions. The number of these tours has risen dramatically.

The Greyfield Land Corporation operates a hotel (the Greyfield Inn) on private property located south of the wilderness. It provides transportation, lodging, food and beverage service, and other amenities for its guests. Being party to the 1964 and 1965 Camden County Judgment and Supplemental Decree, the NPS believed the Greyfield Land Corporation possessed the right to operate vehicles on the Main Road. In order to operate a

commercial service in the national seashore, the Greyfield Inn secured an incidental business permit from the NPS to transport its overnight guests by vehicle on the Main Road, to the Settlement, and to the beach.

Wilderness-oriented commercial services that contribute to achieving public education and enjoyment of wilderness values or that provide opportunities for primitive and unconfined types of recreation may be authorized if they pass the appropriate test of the Concessions Policy and Wilderness Acts and if they are consistent with the objectives of this WMP.

The only structures used by commercial services that will be allowed in wilderness will be temporary shelters, such as tents, or other specifically approved facilities that may be required for resource protection and the preservation of wilderness values and those that will not cause degradation of the wilderness resources. Temporary facilities will be removed from the wilderness after each trip. The use of supply caches by commercial operators is prohibited within wilderness.

Appropriate Commercial Services

The objectives for commercial services in the Cumberland Island Wilderness will be to (1) allow visitors who otherwise might not be able to enjoy primitive and unconfined types of recreation; (2) enhance visitors' appreciation of the unique values of wilderness; and (3) teach visitors how to leave no trace from their visit to the wilderness. Commercial services will only be authorized for Cumberland Island Wilderness if they (1) are appropriate for public use of the wilderness and its resources, including natural and cultural resources; (2) preserve wilderness values; (3) will be conducted in a manner that follows guidelines in this WMP; (4) comply with legal agreements and judgments; and (5) meet the terms of conditions in documents authorizing commercial use.

To meet the Concession Policy Act test, commercial services must be appropriate. Criteria to determine appropriateness include: (1) does the commercial service provide an opportunity for primitive and unconfined types of recreation; (2) is the commercial activity wilderness-dependent; (3) does it enhance the use and enjoyment of the wilderness resources without impairing wilderness resources and values; and (4) will the service be offered in the location and manner that least affects wilderness values?

Commercial activities in Cumberland Island's wilderness will be limited to appropriate wilderness-dependent activities. These include kayaking, backpacking, wilderness skills, natural history, photography, and cultural history. The number of commercial operators for each activity type will be kept to the minimum necessary to meet the demand for approved services. Commercial activities will be limited to locations and time periods that minimize impacts to the wilderness.

The Office of the Superintendent and its management staff will review all proposals for commercial services and special uses within the wilderness. Proposals will address the type(s) of activities proposed, the specific locations and routes of the activities, the time periods proposed for travel, the projected party size, and number of guides. The

Superintendent will give final approval. National seashore staff responsible for concessions and commercial services will coordinate the administration of the permit.

Commercial Services Authorizations

Concessions Contracts and Commercial Use Authorizations are the major types of authorizations used for commercial wilderness services. The only type of concession contract applicable to the wilderness would be to provide transportation to the north end of the island. Commercial Use Authorizations are for commercial activities initiated and terminated outside a park, with all business activity occurring outside a park. The three types of Commercial Use Authorizations include those for incidental businesses, park services, and tours and transportation operations. The NPS may limit the number that may be issued for activities already licensed. A fee and liability insurance are required to operate within the park. Operators are required to comply with park regulations and any additional applicable guidelines.

Concession contracts require payment of a franchise fee, liability insurance, and compliance with park regulations. The NPS administers the fee structure. Quality of service is evaluated annually by park personnel. General concession contracts require in-depth evaluation and a large initial capital investment.

Commercial Use Authorizations provide written permission for individuals or organizations to use NPS administered resources. Commercial Use Authorizations provide official sanction for such activities and may include specific requirements. They are issued as Short Term, not to exceed two years. In order to improve the quality of service, types of service, number of licensees providing a given service, and impacts to wilderness resources and values, commercial operators in the Cumberland Island Wilderness will be authorized under Commercial Use Authorizations.

The NPS will evaluate any new type of commercial service proposed for the wilderness based on the appropriate criteria listed above; concessions management policies; regulations; and wilderness management objectives, standards, and guidelines. If the NPS determines that the service meets all the criteria, a Short Term (one year) Commercial Use Authorization will be issued. At the end of the first year, if the commercial service provider has met the requirements as stipulated in its authorization, the Commercial Use Authorization may be renewed for one or two years.

To ensure that all visitors to Cumberland Island have a fair opportunity to stay overnight in one of the wilderness camp areas, the NPS will limit the number of spaces available to commercial operators to 25% of the total number nightly (that is, 25% of the total number of visitors permitted to stay overnight in the wilderness on any one night). Advanced reservations may be made, following the same guidelines as the general public.

Commercial Service Requirements

Commercial service providers may play a key role in the protection of wilderness resources

and the visitors' wilderness experience. They are in a position to teach visitors the value of wilderness, conservation of natural and cultural resources, and "Leave No Trace" techniques and wilderness skills. A commercial use license will include a list of commercial operation requirements to protect wilderness values and provide visitors with a safe and enjoyable wilderness experience. Requirements will address compliance with park regulations, "Leave No Trace" practices and wilderness ethics. Wilderness use permits are required for each commercial use party entering the wilderness.

Commercial outfitters and clients will follow the same guidelines and regulations as non-commercial visitors. To help instruct clients in "Leave No Trace" techniques, equipment used by commercial operators or provided to clients will be of a type, size, and quantity that is in keeping with the character of the wilderness.

Special Uses

Commercial Filming

The NPS will issue permits for commercial film or commercial photography in the wilderness if the activity is determined to be appropriate for providing educational information about wilderness uses, resources, or values, or necessary for other wilderness purposes. Special permits are required for commercial filming; commercial still photography; and documentaries that explain NPS programs, policies, and philosophies. Those issued permits for commercial film or still photography with a model or a prop will be subject to the minimum requirement determination for activities (including travel) in the wilderness. The NPS will not permit the cutting, damaging, or destroying of any resources for the convenience of placing or using equipment. Group size limitations and other regulations would apply.

Under Public Law 106-154, the NPS will not charge a fee for commercial still photography where the public normally would have access. If commercial still photography with or without models or props takes place in wilderness with the aid of vehicular transportation, a permit will be required and appropriate fees charged.

Special Events

In general, NPS-53 Special Park Uses Guidelines provide guidelines for the issuance of Special Use Permits (SUPs), including NPS policy and instructions regarding Commercial Filming and Photography and Special Events. Subsequent changes in law and regulations may modify the administration of the SUP program.

Per NPS-53, the Superintendent may authorize special events under permit subject to the same criteria as other special park uses provided that (1) there is a meaningful association between the park and the event, and (2) the event contributes to visitor understanding of the significance of the park. The Superintendent may require compliance with additional criteria based on policy as resource protection dictates.

Occasionally the NPS receives requests to sponsor or issue permits for special events in the wilderness. As a general rule the NPS will not sponsor or issue permits for special events to be conducted in the wilderness if those events might be inconsistent with preservation of wilderness resources and character and do not require a wilderness setting for their completion. These include activities that (1) may adversely affect wilderness resources; (2) are contrary to the purposes for which wilderness has been established; (3) unreasonably impair the atmosphere of peace and tranquility maintained in wilderness; (4) unreasonably interfere with wilderness management activities of park staff, visitors, or commercial service providers; (5) are a clear and present danger to public health and safety; and (6) will result in significant conflict with other existing uses.

Special events can cause wilderness resource degradation and intrude on the opportunities for solitude. The NPS will evaluate a request for issuing permits through the minimum requirement process. The NPS will not issue permits for special events that are commercial enterprises; competitive events; activities involving animal, foot, or watercraft races or physical endurance of a person or animal; organized survival exercises; war games; or other similar exercises.

Permits will include terms requiring full compliance with wilderness regulations and guidelines. Also, permits may include special terms and conditions to ensure that wilderness resources and visitors' wilderness experience are protected, such as limitations on type of equipment used or the time, length of time, or location where the event may take place.

The NPS frequently receives inquiries regarding community gatherings (including weddings) in the wilderness, in particular at the First African Baptist Church on the north end of the wilderness. The park will grant permits for community gatherings at this location or another in the wilderness as long as the requesting party agrees to the following stipulations: (1) members of the party will travel through the wilderness to the site on foot, and (2) the party will travel through the wilderness in a group not exceeding the maximum wilderness group size of 15. For community gatherings at the First African Baptist Church the party will travel through the wilderness in separate groups adhering to the WMP's provisions for group travel (see the section, Organized Groups). The groups may reassemble at the church. No more than 25 people may occupy the church at any time.

Special Tours

Occasionally, various groups or individuals ask the NPS to lead special tours in the wilderness. Requests may come from the media (radio, television, and print), cultural and natural resource organizations, congressional offices (Federal and State), local officials including chambers of commerce, and other agencies (Federal, State, and local). Officials from various NPS offices also request tours for various purposes.

Generally, these tours range from several hours to a couple of days. Numbers of individuals range from one to forty. For the most part the NPS has driven these groups or individuals along the Main Road, the beach, or other roads in the wilderness.

To determine whether these tours will continue, the NPS must consider the following questions: (1) is this tour necessary and appropriate to conduct in the wilderness, and (2) how will the tour be conducted?

The role of special tours in the Cumberland Island wilderness will be to (1) allow groups or individuals to become familiar with a particular wilderness issue that necessitates on-the-ground contact with the resource, and (2) enhance groups' or individuals' appreciation of the unique values of wilderness. Special tours will be authorized at Cumberland Island only if they (1) are necessary and appropriate for official use of the wilderness; (2) preserve wilderness values; and (3) will be conducted in a manner that follows guidelines in this plan.

To determine if the special tour is necessary the following criteria will be considered: (1) do these groups or individuals lack the necessary knowledge to conduct their business without visiting the Cumberland Island wilderness; (2) could the work be successfully completed without visiting the wilderness; (3) are more effective means available for completing the work outside the wilderness; (4) is there an essential need for this work?

Conducting these special tours in the wilderness will necessitate a great deal of planning and preparation. The park will inform the individuals or members of the group of the expected transportation mode, length of journey, and equipment needed. These special tours will require the participants to prepare to spend the night(s) in the wilderness.

The NPS also receives requests from retained rights holders and heirs with family buried on the island. Those with driving rights specified in their reserved estates may drive on the road system defined by this plan.

The NPS proposes three alternatives for special tours travelling to and in the wilderness:

Alternative 1 (Preferred): The NPS would transport tour participants to Plum Orchard and to the north end by boat. Tour participants may be driven to the wilderness boundary near Stafford. From those points, tour participants would walk to all other areas within the wilderness.

Alternative 2: The NPS would transport special tour participants over the Main Road, North Cut Road, and on the beach. Members of these groups would walk to areas off the Main Road, North Cut Road, and the beach.

Alternative 3: The NPS would transport tour participants to Plum Orchard by vehicle and to the north end by boat. Tour participants would walk to all other areas within the wilderness from Plum Orchard and from the north end boat landing area.

Organized Groups

Organized groups such as school, Girl Scout, Boy Scout, university, and church groups can offer participants an opportunity to enjoy wilderness recreation. Knowledgeable leaders are instrumental in providing the group with a good understanding and

appreciation of wilderness values and minimum impact techniques. Large groups can cause greater impacts to wilderness resources and other visitors' wilderness experience than can smaller parties. To assist larger parties in minimizing their impacts on the wilderness, the park will place special emphasis on providing organized groups with "Leave No Trace" information prior to their visit. Organized groups using the wilderness may often have specific needs, such as larger campsites. However, the national seashore will limit group size and camp area capacity to 15; larger groups must divide into smaller units when travelling or camping within the wilderness. Evaluation of seven years of group wilderness camping records suggests that such restrictions would not affect many groups.

Removal of Timber

Dead and downed wood provides important niches and habitats for all forms of flora and fauna on the island. It also contributes to the recycling of nutrients into nutrient-poor soils. The NPS will not permit the removal of timber in the wilderness except for those retained rights holders whose agreements explicitly allow timber removal for residential purposes. This is usually limited to their retained right holdings or otherwise defined in their retained rights.

Five retained rights holders have the right to gather dead and downed wood on the property on which they may exercise their retained rights in the wilderness. Only dead and downed timber may be gathered. For the purpose of reaching and transporting the timber, retained rights holders will be limited to operating their vehicles on the roads as defined by the Road System section in the WMP.

Food Storage

Occasionally raccoons become accustomed to seeking out campers' food supplies. To prevent raccoon dependence on human food, campers, hikers, kayakers, and canoeists should protect their food by using food storage devices and portable food storage containers.

Natural Resource Management

The conditions and long-term trends of wilderness resources will be monitored to identify the need for and result of management actions. The NPS will monitor wilderness resources and educate visitors as necessary to ensure that impacts to wilderness resources and character do not exceed standards and conditions established in the WMP.

Wilderness monitoring programs will assess physical, biological, and cultural resources, and social impacts. These programs will also be designed to identify impacts that originate outside the wilderness and to determine the nature, magnitude, and probable source of those impacts. Information from monitoring programs will be used by the park to preserve wilderness resource values.

The NPS also has the responsibility to support appropriate scientific activities in the wilderness and to use science to improve wilderness management. The NPS further recognizes that appropriate scientific activities may be critical to the long-term preservation of wilderness.

Scientific activities that involve a potential impact to wilderness resources or values will be allowed when the benefits to wilderness outweigh the impacts; however, all such activities must also be evaluated using the minimum requirement process and include documented compliance assessing impacts against benefits to the wilderness. This process should assure the activity is necessary and appropriate and use the minimum tool required to accomplish project objectives.

The NPS has prepared a Natural Resource Management Plan (NRMP) that discusses how the park will take actions relevant to the CUIS's natural resources. The natural resource management objectives are:

- Establish baseline information for those populations and processes where this is lacking in order to better understand and manage island biota and systems;
- Establish long-term monitoring to detect natural and human-induced changes and to provide the basis for management response;
- Promote and coordinate research activities that enhance knowledge of island biota and systems;
- Manage the island in harmony with natural barrier island processes to the greatest extent possible;
- Restore and/or protect native populations and natural communities and control or remove invasive non-native species;
- Restore and/or protect native populations and natural communities to provide habitat protection for and enhance or maintain populations of threatened and endangered species;
- Restore and maintain conditions in non-historic areas so that the human impacts are substantially unnoticeable;
- Enhance data management and display, statistical evaluation, and predictive capabilities through the use of Geographic Information Systems (GIS) and other data systems; and
- Staff and fund the Natural Resource Program to a level that adequately addresses resource issues within the seashore.

The NRMP describes how the NPS will address the above objectives. The plan lists a series of projects to accomplish the objectives. Implementation of a project depends upon securing adequate staff and resources. Most of the actions will affect wilderness.

Cultural Resource Management

The Wilderness Act directs the NPS to preserve the wilderness character of an area and administer that area for other purposes “for which it may have been established as also to preserve its wilderness character.” Thus the NPS is responsible for maintaining an affirmative cultural resource management program in wilderness. Cultural resource management tasks within wilderness must be prescribed and implemented in a manner that preserves other wilderness resources and character. (The CRMP includes detailed descriptions of CUIS’ cultural resources and strategies for their preservation.)

Section 106 of the National Historic Preservation Act (NHPA) is the primary legal instrument for ensuring that all Federal agencies seek ways to avoid or minimize adverse effects to cultural resources. Section 106 mandates that Federal agencies take into account the effects of their actions on properties listed or eligible for listing in the National Register of Historic Places and provide the State Historic Preservation Officer (SHPO) and the Advisory Council on Historic Preservation a reasonable opportunity to comment on those actions.

The Advisory Council's regulations, *Protection of Historic Properties* (36 CFR Part 800), define the process of review and consultation, including the participation by SHPOs, the public, and Native American groups in the overall process. The regulations state that actions carried out by or on behalf of a Federal agency that could alter aspects of the location, design, setting, materials, workmanship, feeling and association, or use of a Register-listed or eligible property must be carefully considered for any possible effects on historic qualities and research potential. Undertakings include obvious interventions such as installation of new plantings or fences in a Register-eligible cultural landscape, rehabilitation of a structure, and ground-disturbing activity. Undertakings also include new construction that could affect the setting of a historic property and other actions that could introduce visual or audible elements out of keeping with its historic character.

CUIS, like every unit of the National Park System, conducts a program for Section 106 review and consultation on any actions that may affect historic resources within the park's jurisdiction. The Section 106 review program plays an essential role in the overall park project planning process and is administered as early as possible in that process to allow the proper consideration of any possible effects of proposed actions on historic resources. The Superintendent and chief program managers, among others, play a crucial role in the administration of park compliance obligations. As the agency official for park Section 106 activities, the Superintendent ensures that all undertakings within the park's jurisdiction, including those carried out by outside parties, are identified, documented,

and considered for their effects on historic properties, with the appropriate input of NPS cultural resource specialists, SHPOs, and other interested parties.

The substantial number of reserved estates at CUIS adds another dimension to the coordination of Section 106 responsibilities. Because these reserved estates will transfer to the NPS upon their expiration, the NPS has a vested interest in their management and care. Holders of reserved estates also play an important role in the stewardship of their property. By occupying properties that fall within indirect federal jurisdiction, retained rights holders have the responsibility to initiate Section 106 compliance for any undertaking that could significantly impair any aspect of National Register-listed or eligible resources on their property. This obligation is stated in the Advisory Council on Historic Preservation's regulations, which require Section 106 compliance for undertakings on historic properties whether federal agency jurisdiction is direct or indirect. In addition to assisting on 106 actions, the park has a responsibility to take an active role in providing technical assistance on cultural resources preservation matters to retained rights holders. Procedures for Conducting Section 106 Compliance on Reserved Estates are described in detail in the CRMP. The WMP summarizes the 106 process that is relevant to cultural resources found on reserved estates throughout CUIS.

Procedures for Conducting Section 106 Compliance on Reserved Estates

When retained rights holders intend any action on their property that may significantly affect cultural resources, including historic structures/ruins and archeological resources that may be affected by ground disturbing activities, the following steps will be followed to initiate compliance with Section 106:

1. The retained rights holder will notify the Superintendent in writing of the proposed action, accompanied by a brief description of the scope of work.
2. The Superintendent will make a preliminary determination on any potential effects the proposed action may have on cultural resources. This determination may require a meeting or site visit by park staff to the property to review the proposed action with the lessee. The park will notify the lessee if a meeting or site visit is necessary.
3. Once adequate information has been collected on the proposed action's scope of work, the Superintendent will initiate the review process. Upon consulting with NPS cultural resource advisors and the State Historic Preservation Officer as necessary, the Superintendent may determine that the proposed action will have no effect on cultural resources, then the retained rights holder may proceed with the project. If the Superintendent determines that the proposed action may affect cultural resources, then the park will undertake completion of Section 106 review and consultation on behalf of the retained rights holder.
4. The park will conduct Section 106 review and consultation pursuant to the NPS compliance procedures (as stated above) and will work with the retained rights holder to ensure that all Section 106 obligations are completed in a timely manner.

Historic Property Treatments

Pursuant to the NPS *Management Policies* and *Director's Order #28 (Cultural Resource Management Guidelines)*, the NPS recognizes four distinct, but interrelated standards for the treatment of historic properties: preservation, rehabilitation, restoration, and reconstruction. Treatment for archeological resources in the NPS focuses only on preservation. The NPS *Management Policies* prohibit rehabilitation, restoration, and reconstruction of archeological resources, which shall be "be left undisturbed unless removal of artifacts or intervention into fabric is justified by protection, research, interpretive, or development requirements." Refer to the RMP for a more detailed discussion of treatment standards.

Several national register districts or sites exist in or near the wilderness: Plum Orchard (located next to the wilderness), High Point/Half Moon Bluff, Rayfield Chimneys, Stafford (next to the wilderness), the Main Road, and the multiple archeological sites. Historic structures will require the most intervention. The park will use the minimum requirement determination process to identify alternatives to perform an activity and then determine the minimum tool to employ. As a general rule, power tools may be used to perform the initial treatment activity on the historic resources, i.e. to establish the initial standard condition. Major cyclic maintenance projects, such as a large-scale re-roofing, may also involve the use of power equipment.

To minimize use of the Main Road by vehicles the NPS will employ the Plum Orchard dock as the principal receiving point for materials and supplies. Whenever possible, staff will prepare materials at Plum Orchard prior to transport to the particular historic resource. The NPS will use the necessary tool here to execute the selected preservation treatment on the Plum Orchard structures and on its landscape features. Careful planning and site work will reduce (and strive to eliminate) the need to use power tools at structures within the wilderness.

The NPS or its agents may be able to use the Main Road and Plum Orchard Road to transport staff and materials to perform the selected preservation treatment and large-scale cyclic maintenance projects on the structures and landscape at Plum Orchard. The NPS or its agents will use boats landing at the Plum Orchard dock for routine maintenance activities.

The NPS will use the minimum requirement process to determine how to transport (boat, vehicle, on foot) people and prepared materials to conduct the selected preservation activity and major cyclic maintenance projects on the historic resources in the wilderness. The NPS or its agents will walk from Plum Orchard or the north end dock to historic resources in the wilderness to perform routine preservation tasks and will use hand tools. Periodic inspections of the structures will reduce the need to conduct frequent major maintenance activities and keep the repairs to small jobs. The NPS will depend upon volunteers and partners to conduct some of these maintenance functions. When project scale is too large or tools, materials, or equipment needs are beyond what can be

transported on foot, the NPS will use vehicles to perform historic structure maintenance. The NPS will schedule the projects carefully to reduce the number of trips to the absolute minimum. Outside agencies, volunteers, or non-profit organizations may supplement those resources not receiving adequate funding through the park's normal channels.

Travel to and from cultural resources located within the wilderness to plan for, assess, and evaluate the preservation of cultural resources structures will be by foot. Staff or others involved in these activities will follow the organized group guidelines.

Archeological Resources

Archeological resources dot the wilderness landscape on CUIS. Preserving these resources is most effectively addressed by periodic monitoring, stabilization (when appropriate), and conscientiously protecting knowledge of their. NPS staff or its agents involved in archeological protection or salvage activities will reach sites by foot. Although the NPS conducted an archeological survey of CUIS in 1976 in compliance with Executive Order 11393, further studies may be required in the future. Access to the wilderness may be initiated from water at Plum Orchard or at designated points on the north end of the island. Once in the wilderness, the NPS will follow organized group guidelines. The RMP outlines specific actions related to archeological resources.

Ethnographic Resources

The ethnographic resources of CUIS have not been specifically inventoried, although a number of oral history interviews were conducted with former and current island residents and workers. Ethnographic resources include various objects, natural resources, and landscapes culturally meaningful to the current residents of the island and their immediate forebears along with those whose ancestors once lived on the island, provided services to island residents, and used the island's resources. A special resource study of Low Country Gullah Culture may involve research into the ethnographic resources of CUIS. Access to the wilderness to conduct oral histories or inventory ethnographic resources may be initiated from water at Plum Orchard or at designated points on the north end of the island. Once in the wilderness the NPS will follow organized group guidelines.

Fire Management

Historic Role of Fire on Cumberland Island National Seashore

The NPS recognizes that fire is, and will continue to be, a critical component of the ecology of the southeastern United States barrier island ecosystems. Lightning-caused fires and those ignited by prehistoric inhabitants played an indelible role in the evolving and perpetuating the oak-savanna and pine-palmetto vegetative communities found on these islands.

Prior to European settlement, fires occurred on Cumberland Island at approximately 20- to 30-year intervals. Under normal conditions, these fires burned relatively slowly, with short flame-lengths through the understory vegetation, leaving most mature trees intact. Such fires, considered "cool" fires, cleared the vegetative communities of thick stands of growth, leaving the island with an open, park-like environment.

With the coming of European exploration and settlement, the use of fire to clear agricultural land and other intentional and accidental ignitions increased the frequency of fires on Cumberland Island. This activity, efforts to suppress what were considered "bad" fires, and the introduction of numerous exotic plant species significantly changed the composition of the vegetative communities, and, which in turn changed the net effect of subsequent lightning-caused fires. Fires that previously burned through relatively light accumulations of dead and downed fuels now were accelerated by accumulations of fuels. Consequently, fires that previously burned at relatively cool intensities now burn with increased heat and duration and have the capacity to take larger trees and shrubs as well as to sterilize soil biotic communities.

The NPS will restore fire to its ecological role on CUIS and use ignited management fires as a tool to approximate as closely as possible the vegetative conditions (similar species and densities) that were likely present at the arrival of European inhabitants.

The CUIS fire management program recognizes the dynamic nature of native vegetative communities and will attempt to re-establish the natural ecology of the island including the normal successional stages that affect most vegetative communities. As prescribed by the Cultural Resource Management Plan, the NPS will preserve certain cultural landscapes that may not reflect the conditions at the time of European landings. Some exotic vegetation may be intentionally preserved in the cultural landscapes.

Likewise, the fire management program recognizes that this wilderness is laced with private residences that must be protected. Mechanical clearing or prescribed fire may be used to clear understory fuels that have built up around residences.

The fire program within CUIS will be administered under an approved Fire Management Plan (FMP). All wildland fire management operations within wilderness will conform to the purposes of wilderness including the application of "minimum impact suppression tactics" for all actions directly impacting wilderness resources. Fires burning within designated wilderness areas will be classified as either "wildland" fires or "prescribed" fires.

All non-prescribed, man-caused ignitions will be classified as "wildland" fires and suppression actions will be taken immediately. Natural ignition "lightning" will be managed as "prescribed" fires under predetermined prescriptions.

All fires burning in natural or landscaped vegetation will be classified as either wildland fires or prescribed fires. All wildland fires will be effectively managed, considering resource values to be protected and firefighter and public safety, using the full range of

strategic and tactical options as described in an approved FMP. Prescribed fires are those fires ignited by park managers that will be managed under specific environmental conditions to achieve resource objectives. For example, prescribed fires may be used to reduce unnatural fuel loads that have built up from decades of fire suppression, thus allowing naturally occurring fire an opportunity to burn without unnatural, catastrophic consequences. Prescribed fire may be used around residences to maintain very low fuel levels that would not be likely to carry a wildfire when it approached.

Management, pre-suppression, and suppression techniques, including the identification of wilderness minimal requirement protocols, for both wildfires and prescribed fires will be identified within the park's approved FMP. This document will also consider the factors of public safety, air quality, smoke management, and the protection of private property in developing the appropriate responses to fires on the island.

Until the park's FMP is approved, the park must take an aggressive suppression action on all wildland fires consistent with firefighter and public safety and resources to be protected. All naturally ignited wildland fires may be managed to accomplish resource management goals once an appropriate FMP is approved. Minimum impact suppression tactics will be applied to all fire management activities to determine the exact methods for fire pre-suppression and suppression. A confinement strategy may be implemented as the initial attack action as long as it is not used to meet resource objectives. Confinement strategy can be selected through the wildland fire situation analysis process when a fire is expected to exceed initial attack capability or planned management capability.

Interpretation and Education

CINS will develop and maintain an effective public education program designed to promote and perpetuate public awareness of and appreciation for wilderness character, resources, and ethics, while providing for acceptable limits of use. Efforts will focus on resource protection, including the application of "Leave No Trace" techniques; safe wilderness practices; and fostering an understanding of wilderness resources including ecological and aesthetic values. NPS interpretive programs will encourage the public to use and accept wilderness on its own terms, that is, to accept an undeveloped, primitive environment and to assume the potential risks and responsibilities involved in using and enjoying the wilderness.

At CUIS the NPS has the additional responsibility to make visitors aware of the complex nature of the wilderness in regard to retained rights and the island's history. Frequently visitors encounter uses in the wilderness not usually associated with wilderness. In those cases, the NPS will use the appropriate message and media to inform visitors that, for example, residents of the island have the right to operate vehicles on roads in the wilderness. The NPS will attempt to build realistic visitor expectations and an understanding of the history that lead up to the establishment of a wilderness that is laced with roads, residences, utilities, and historic structures.

The NPS has identified five target audiences for its educational and interpretive efforts: island visitors, island residents, guests of island residents (including guests of the Greyfield Inn), NPS employees, and the non-visiting public.

It is important to reach island visitors at four stages: (1) during their planning and preparation; (2) when they arrive at the mainland embarkation site; (3) when they first arrive on the island; and (4) during their wilderness experience.

The NPS will develop the appropriate messages and materials to prepare visitors for the wilderness without eliminating the element of risk and adventure inherent in a wilderness experience. It is critical that the NPS reaches visitors during the preparation phase. In that way visitors will have better appreciation of the unusual circumstances they may experience in the Cumberland Island Wilderness. These efforts will be reinforced with information on the mainland and on the island before visitors step foot in the wilderness. Bulletin boards displaying information about the wilderness will be erected at key locations outside the wilderness. Park staff will seek to communicate with all wilderness visitors about key wilderness issues concerning safety, “Leave No Trace” techniques, and wilderness values.

At times, the NPS has the opportunity to engage landowners and retained right holders in informal dialogues about the wilderness. Through the *Mullet Wrapper* (the park newsletter), the Superintendent’s annual all-residents’ meeting, and individual contacts, the national seashore staff may keep the island residents informed of wilderness guidelines and issues.

Because guests of retained rights holders and landowners stay in their hosts’ houses, the NPS will work with the Cumberland Island Preservation Society (comprised of landowners and retained rights holders) to develop material explaining wilderness values and the expectation for these guests when they visit the wilderness. Upon consent of the retained rights holder or landowner, these materials will be placed in the houses in which the guests stay. This material will be a key component of the information afforded to guests who stay on the island.

The NPS also has an obligation to train and develop materials for its own employees. Generalized information about wilderness will be developed for the entire staff; particular attention will be placed on those employees, both permanent and seasonal, whose duties involve working in the wilderness or informing others about the wilderness. These materials will cover “Leave No Trace” principles, orientation to wilderness values, wilderness safety, and minimum requirement determination. NPS and other official staff working in the wilderness are expected to understand, appreciate, and follow wilderness principles and values

Research

National Park wilderness provides the opportunity to study some of the most pristine natural ecosystems in the nation. Such areas are critical ecological reference zones against which human-caused change can be measured. The character of the Cumberland

Island Wilderness provides a preserve for biological diversity, genetic richness, and threatened and endangered animal species. This natural laboratory provides invaluable opportunities for air and water quality studies and for biologic study. The objective for research within the Cumberland Island Wilderness will be to encourage research projects that help increase the knowledge of wilderness resources and values.

The Wilderness Act states that wilderness shall be devoted to specific public purposes, including scientific, educational and conservation use. Management policies outline that “the NPS will fully support the value of wilderness areas as natural outdoor laboratories.” A research project may be conducted in wilderness, according to policy, when the following requirements are met: (1) the research activities are otherwise allowable under federal laws and regulations; (2) there is no alternative to conducting the research in a wilderness area; (3) the project will not adversely affect physical or biological resources, ecosystem processes, aesthetic values, or wilderness resources values over an area or duration greater than necessary to meet research objectives; and (4) the project will not interfere with recreational, scenic, or conservation purposes of the wilderness over a broad area or long duration.

Research facilities and equipment are sometimes required to carry out research projects; however, they can intrude upon the visitor’s wilderness experience and affect wilderness resources. Management policies state that research and monitoring devices may be installed and operated in wilderness if: (1) the desired information is essential and cannot be obtained outside wilderness, and (2) the proposed device is the minimum tool necessary to meet project objectives safely and successfully. A Research-Collection-Special Use Permit application must list all project equipment and facilities. A justification must be included for why each item is necessary and why it is the minimum tool. A minimum requirement determination will be made to help decide if proposed research is appropriate.

When determining approval of research project, consideration will be given to what research facilities (including structures), markers, and equipment are required. Criteria for determining whether research equipment or facilities are appropriate include: (1) value of the research for wilderness protection management; (2) potential impact of the facilities or equipment on wilderness resources; (3) length of time equipment or facilities will remain; (4) relative intrusion of equipment or facilities on the wilderness setting; (5) ease and method of removal; and (6) potential for site restoration. All facilities and equipment must be temporary. No hardened sites will be permitted.

Potential Wilderness

Public Law 97-250 of 1982 established the Cumberland Island Wilderness. The law designated 8,840 acres as wilderness and 11,718 acres as potential wilderness. When all non-conforming uses prohibited by the Wilderness Act on the 11,718 acres have ceased the Secretary may declare those lands as designated wilderness.

Subject to valid existing rights, the NPS will manage the potential wilderness as wilderness to the extent that existing non-conforming uses will allow. If uses prohibited by the Wilderness Act have ceased within the potential wilderness, the NPS will take the steps necessary for the Secretary to publish in the *Federal Register* the notice that the potential wilderness is now designated wilderness. This should be done within one year of the termination of the non-conforming use.

Subject to valid existing rights, the NPS will discourage uses incompatible with wilderness values in the potential wilderness area. When non-conforming uses expire, remnants of those uses such as non-historic buildings and other non-historic structures and exotic plants and animals may still exist. The disposition of these remnants will be addressed to restore the wilderness character of the area. The minimum requirement process will be followed.

WILDERNESS MANAGEMENT PLAN IMPLEMENTATION

Plan Coordination, Implementation, and Accountability

The Cumberland Island Wilderness represents the sole wilderness in the National Park System in the State of Georgia. The U.S. Fish and Wildlife Service manages approximately 370,000 acres of the Okefenokee National Wildlife Refuge as wilderness. The United States Forest Service administers 114,616 acres of wilderness in ten areas as part of the Chattahoochee National Forest in north Georgia. The Cumberland Island Wilderness is distinctive from other wilderness areas in the State as it includes a barrier island and a maritime forest ecosystem. The Cumberland Island Wilderness has much in common with the other areas, most significantly the Wilderness Act mandate that establishes the Congressional direction for managing wilderness areas.

Where possible, consistency in wilderness management objectives, techniques, and practices will be sought with other NPS and other agency units of the National Wilderness Preservation System, while ensuring that Cumberland Island's wilderness resources and character are protected. Intra-agency and interagency wilderness management communication will be fostered through individual communication and regional workshops. Coordination with other NPS areas with designated and non-designated wilderness will be actively pursued at the Washington Office, Regional Office, and park levels. The NPS will seek the cooperation of local and regional governments, the U.S. Navy, the U.S. Army Corps of Engineers, the Coast Guard, various offices and divisions of the State of Georgia Department of Natural Resources, and other public and private entities to preserve the wilderness values of the island.

As evidenced by the present planning effort, the WMP is being coordinated with various other operational plans: CRMP, NRMP, Commercial Services Plan (CSP), and Long Range Interpretive Plan (LRIP). In addition, the WMP recognizes the need to prepare other documents such as a hog management plan and a fire management plan. Both of these documents will incorporate the guidance offered in the WMP. The WMP will affect park operations ranging from law enforcement to maintenance to the turtle-monitoring project. The WMP includes minimum requirement determinations affecting many aspects of park operations and requires that a determination be prepared on all other park activities conducted in the wilderness.

A process for implementing the WMP is needed to meet wilderness management objectives. The implementation cycle was developed to provide a formalized process to include wilderness management needs in the park goal setting and budget distribution process and to integrate and coordinate wilderness program planning, prioritization and implementation between park divisions.

The implementation process includes monitoring of wilderness resources and visitor experience conditions and preparing the "State of the Wilderness Report," to be included

in the Superintendent's *Annual Report*. The plan will be implemented through coordination with other park programs and the budget process.

The WMP implementation cycle begins with inventory and monitoring of existing resources, visitor experience, and managerial conditions. A State of the Wilderness Report is prepared, comparing the existing conditions to the resource, visitor experience and managerial standards found in the WMP. A Wilderness Action Plan is prepared outlining a strategy to bring unacceptable conditions within standard and maintain acceptable conditions at or above those levels. The Wilderness Action Plan is implemented following guidelines in the WMP. Implementation of the WMP is the responsibility of all employees. The position descriptions of the Superintendent, Chief of Resources Management, Chief Ranger, Chief of Maintenance, and wilderness patrol ranger(s) will contain elements referring to their wilderness responsibilities.

Each division will be responsible for preparing applicable minimum requirement determinations. The division chief will then recommend the determination for approval by the Superintendent. In case a determination affects more than one division, the appropriate division chiefs will jointly submit the recommendation to the Superintendent.

Wilderness management accountability is established through completion of the following:

- Critical Results: The Southeast Regional Director has included in the Critical Results element of the Employee Performance Plan and Results Report (Form DI-2002) for the Superintendent of Cumberland Island Wilderness a statement on wilderness management. Documentation of these critical results will clearly identify and ensure appropriate focus on their wilderness management responsibilities.
- Position Descriptions: All positions having significant wilderness responsibilities are supported by position descriptions identifying these responsibilities.
- KSA's: Wilderness is effectively integrated into the Knowledge, Skills, and Abilities requirements for all position announcements having significant wilderness responsibilities.
- Staff Training: Each key person responsible for the management and protection of wilderness resources receives the wilderness training necessary to ensure awareness, knowledge of, and accountability for their specific wilderness responsibilities.
- GPRA Strategic Plan: Wilderness stewardship responsibilities are referenced in the park's strategic plan developed pursuant to the Government Performance and Results Act.
- Annual Report to Congress: The Superintendent will provide to the Associate Director for Park Operations and Education the park information requested for

preparing the annual report to Congress as required by Section 7 of the Wilderness Act.

- **Public Oversight Committee:** The Superintendent will use the CUIS Advisory Committee to review the park's progress in implementing the WMP. The group will assemble and report on to the Superintendent periodically.

Monitoring Of Wilderness Resources

At CUIS the conditions and long-term trends of wilderness resources will be monitored to identify the need for, and result of, management actions. The NPS will monitor wilderness resources and educate visitors as necessary to ensure that impacts to wilderness resources and character do not exceed standards and conditions established in the WMP.

Wilderness monitoring programs will assess physical, biological, and cultural resources and visitor experience impacts. These programs will also be designed to identify impacts that originate outside the wilderness and to determine the nature, magnitude, and probable source of those impacts. Information from monitoring programs will be used by managers to preserve wilderness values.

The NPS will develop a monitoring system to assess visitor impacts on key resources at camp areas, along trail corridors, and at cultural resource sites. Resources include vegetation, soils, wildlife, water (groundwater and surface water), and cultural resources.

Through a visitor use survey, the NPS will monitor visitor use levels by measuring the quality of the visitor experience. The survey will clearly elucidate wilderness values to determine the quality of the experience. The visitor survey and visitor feedback will indicate the effects of external influences on the visitor experience. The survey will also measure the number of encounters between wilderness hikers and between hikers and vehicles and evaluate the effect of the encounters on the visitor experience.